

Classification:

Key Decision: Yes

Gravesham Borough Council

Report to: Cabinet

Date: 6th February 2012

Reporting officer: Director (Housing and Regeneration)

Subject: Member guidance on preferred outcomes for Regulation 27 Core Strategy

Purpose and summary of report:

To ensure that unnecessary work is not undertaken, a steer on preferred strategic outcomes is requested from Cabinet whilst recognising that this is work in progress as the consultation only finished on 22nd December 2011.

Recommendations:

1. That Cabinet give guidance on their preferred outcomes in the publication stage Core Strategy whilst recognising that further work is required
2. That the additional work identified be undertaken
3. That the emerging Core Strategy be added to the agenda for Planning Delivery Committee on 28th March 2012 which is open to all Members to attend
4. That the Leader and Planning Delivery portfolio holder make interim decisions for the publication stage Core Strategy in response to the issues being raised using their delegated powers

1. Format of this report

- 1.1 To try and make this report easier to digest, the report structure is as follows:
 - 1.1.1 A brief summary of the history preceding the October 2011 consultation
 - 1.1.2 An explanation of the rationale underpinning the Growth Scenarios and Core Strategy document
 - 1.1.3 An estimate of the scale of representations received
 - 1.1.4 Some of the key issues raised in response to the Growth Scenarios and Core Strategy consultation with more detail in Appendix B
 - 1.1.5 Key policy, evidence and site changes since the interim consultation documents were produced
 - 1.1.6 A request to Cabinet for guidance on their preferred outcomes to reduce abortive work

- 1.1.7 Potential preferred outcomes in emerging Core Strategy for further consideration and technical work
- 1.1.8 Risks and implications for further investigation
- 1.1.9 Next steps including additional work and timetable for producing the publication stage Core Strategy
- 1.1.10 Four appendices are included:
 - Appendix A = Draft residential land supply table
 - Appendix B = Gravesham Growth Scenarios and Core Strategy – Response to Interim Consultation as at 25th January 2012
 - Appendix C = Kent Housing Group evidence
 - Appendix D = Extracts from draft National Planning Policy Framework (NPPF)

2. Background

- 2.1 This is a complex and time-consuming process and therefore it is necessary to briefly explain some of the background:
 - 2.1.1 The adopted South East Plan gives Gravesham a requirement for 9,300 dwellings for 2006-2026, 9,200 to be located north of the A2.
 - 2.1.2 After analysing the representations to the January 2010 Regulation 25 Core Strategy and Development Management Policies DPD 2010 and the current land supply, it became apparent that there was insufficient previously-developed land which could be identified to meet this dwelling requirement. This meant that Gravesham could not meet the dwelling requirement in the South East Plan on the land identified by the plan. The abolition of the South East Plan, then being proposed by the Government, gave the Council the opportunity to consider what growth level it wanted and the sites needed to deliver this.
 - 2.1.3 When work started on the Growth Scenarios and Core Strategy in late Summer 2010, the September 2009 demographic projections from KCC were the most recent available. For 2006-2026 the dwelling requirement would have been 7,000 dwellings for the zero-net migration projection and 8,400 dwellings for the long-term migration projection. At that time, the six scenarios produced ranged from 5,900 to 9,900 dwellings. A significant shortfall in sites was identified for even the lowest of these scenarios.
 - 2.1.4 New demographic and labour supply projections were commissioned from KCC using their new local forecasting model and results were received in July 2011. The population-controlled forecasts were much lower than those previously published and this reduced the likely dwelling shortfall to less than 1000 dwellings.

3. Rationale underpinning Growth Scenarios and Core Strategy document

Changing policy framework

- 3.1 A report was taken to Cabinet in October 2010 entitled 'An update on the Gravesham Local Development Framework in a changing policy environment' which advocated waiting for policy clarification.
- 3.2 In late 2010 / early 2011, the draft Localism Bill did not provide the clarity expected but the messages from central government were:
 - 3.2.1 A need for a significant increase in housing development.
 - 3.2.2 The ability to set local targets but these were expected to meet our full demand for housing and that we needed to show a developable and deliverable supply
 - 3.2.3 In June 2011, CLG published a press release about a 'presumption in favour of sustainable development' which advised that "without an up-to-date plan, decisions will be made according to national policy". As the Council's adopted Local Plan is 1994, this was a major concern.
- 3.3 Initial work had highlighted that site quantities in SE Plan were unachievable and therefore a reduction in growth level was anticipated.

Rationale for October 2011 consultation document

- 3.4 The Core Strategy and Development Management Policies Document 2010, identified sufficient sites within the urban area to meet Gravesham's housing requirement in the South East Plan of 9,300 dwellings from 2006-2026 without needing to identify sites in the Green Belt but a number of the underpinning assumptions have subsequently been queried.
- 3.5 The Localism Act 2011, will abolish regional plans and consequently the draft National Planning Policy Framework now makes local planning authorities responsible for establishing their own development requirements.
- 3.6 Using the most up to date population projections, the Council identified a substantially reduced housing requirement, even with an extended plan period to 2031. It identified six growth scenarios and indicated a preference for a range of 4,600 to 5,200 with 5,200 being used for additional technical work.
- 3.7 Given the changes in the housing market as a result of the deteriorating national economic situation, the Council considered it prudent to look again at the different housing sub-markets within Gravesham and the likely viability of indicative developments at different densities with and without affordable housing.
- 3.8 The conclusion of this work was that some of the site capacities in the Core Strategy and Development Management Policies Document 2010 were not deliverable and that insufficient land could now be identified to meet even reduced housing requirements within the urban areas and, as a consequence, it was necessary to consider the identification of additional sites. The tight boundaries around the settlements meant that sites within the Green Belt needed to be considered to meet the shortfall of between 320 and 920 dwellings. Unlike many other Green Belt authorities, Gravesham does not have safeguarded / strategic reserve sites identified in its development plan.

- 3.9 As the situation had changed considerably since 2010, the Council considered that a further interim round of public consultation was needed before a final Submission Core Strategy was published in 2012.
- 3.10 The interim consultation also provided the opportunity to ask for comments on potential changes to a number of other policies from the 2010 document and to separate the Core Strategy from the Development Management Policies, which will now be prepared with Site Allocations after the adoption of the Core Strategy.
- 3.11 The consultation took place from 28th October to 22nd December 2011. As well the Growth Scenarios and Core Strategy document all of the supporting documents were available for comments.

4. Representations received

- 4.1 Approximately 5,000 letters, forms, e-mails and petition signatures have been received – see table below for headline estimates.

<i>Media</i>		<i>Description</i>	<i>Estimate</i>
Direct entry to iNovem	1		200
Letters	2	Astra Drive Standard Letter	358
	3	Astra Drive Standard Letter: No Address Supplied	20
	4	Astra Drive Variation on Standard Letter	5
	5	Greenbelt/Greenfield Standard Letter	280
	6	Greenbelt/Greenfield Standard Letter: No Address Supplied	13
	7	Greenbelt/Greenfield Variation on Standard Letter	3
	8	Higham Parish Standard Letter	22
	9	Higham Parish Standard Letter: No Address Supplied	3
	10	Higham Parish Variation on Standard Letter	3
	11	Higham Parish Variation on Standard Letter: No Address Supplied	2
	12	Higham Parish Standard Letter with Annex	14
	13	Higham Parish Standard Letter with Annex: No Address Supplied	2
	14	Higham Parish Variation on Standard Letter with Annex	1
	15	East of Thong Lane Standard Letter	40
	16	North of Drove Way and South of Istead Rise Standard Letter	1182
	17	Meopham, Culverstone and Istead Rise Standard Letter	11
	18	Meopham, Culverstone and Istead Rise Standard Letter: No Address Supplied	9
	19	Meopham, Culverstone and Istead Rise Standard Letter with Added Comments	11
	20	Meopham, Culverstone and Istead Rise Standard Letter with Added Comments: No address Supplied	12
	21	Meopham, Culverstone and Istead Rise Variation on Standard Letter	84
	22	Great Clayne Farm (East of Thong Lane), Thong Lane Standard Letter and Form	85
	23	Great Clayne Farm (East of Thong Lane), Thong Lane Variation on Standard Letter	6
	24	Great Clayne Farm (East of Thong Lane), Standard Letter Only	8
		Great Clayne Farm (East of Thong Lane), Form Only	1
	25	Assorted Representations	472
	26	Assorted Representations: No Address Supplied	26
	27	Other issues (not gf / gb): Organisations etc	30
Petitions (count of signatures)	28	Petitions Against Development in the Greenbelt: A	21
	29	Petitions Against Development in the Greenbelt: B	723
	30	Petitions Against Development in the Greenbelt: C	362
Newspaper	31	Say No Leaflet from paper	7
	32	Form from the Gravesend Reporter	250
E-mail	33		500
TOTAL (estimate 19/01/12)			4766

- 4.2 In order to accurately analyse the representations made, all representations need to be entered and uploaded into our consultation system (iNovem). A number of representors have submitted their representations in duplicate e.g. by letter and e-mail and by standard letters. To record each representation more than once would give an inaccurate consultation result. Multiple submissions by one person will be recorded as one but, this first requires the uploading of all submissions by whatever method in order that they can be attributed to the representor. Hence, until all representations have been uploaded, it is only possible to give an estimation of the responses received.

5. Growth Scenarios and Core Strategy consultation representations

- 5.1 Below are some of the main issues that have been raised that affect the future Core Strategy. It would appear from many of the representations that the consultation documents have not been considered in any depth, and representations have focused on one or a limited number of issues. This situation could have been exacerbated by the tendency of some of the media and others to only report certain aspects or misreport them e.g. a number of articles advised that the Council was proposing 4,600 to 5,200 dwellings in the Green Belt. Appendix B contains a more detailed report of the representations but it is work in progress which will take a number of weeks before officers are confident that all the issues have been identified.

Growth Scenarios

- 5.2 The majority of responses have advised that the growth level should be set at a level that protects the Green Belt and therefore tailor the need / housing requirement so that no releases are required. The 4,600 dwelling scenario is therefore generally the level supported as it is the lowest. Some representations recognise that a higher level may be required and, if so, they advise that greenfield sites should be used for the deficit.
- 5.3 A number of representors want no development at all in Gravesham. The voting at the rural forum meeting echoes this with a significant percentage wanting a different option to the six scenarios given and the option they wanted was none.
- 5.4 Some representors have raised immigration as a concern.
- 5.5 Some representors have suggested that development quantities are being increased by the Council to increase its New Homes Bonus payments. This could have been caused by CPRE Kent's presentation at Meopham which included a slide on the New Homes Bonus. In fact, this conclusion is illogical given that the Council's preferred scenarios propose a reduction of dwellings by at least 4,000 dwellings from that contained in the SE Plan.
- 5.6 Some representors have suggested that the target could be lowered if empty homes were taken into account.
- 5.7 Some representations, primarily landowners and developers as well Dartford BC want the SE Plan requirement to remain as the borough's development requirement. Most of these representations support greenfield / Green Belt development to meet this target although Dartford BC suggests that Gravesham can accommodate 9,300 dwellings without going into Green Belt.

Viability and density

- 5.8 This is a complex issue. CPRE Kent's overly simplistic approach to high density development, which gives Kensington and Chelsea and Cambridge as examples rather than being related to Gravesham's particular circumstances, has been quoted verbatim by a number of representors and this has led to misunderstanding and confusion on this issue.
- 5.9 Notwithstanding this confusion, there are also conflicting responses. Some of the representations are advocating that more family homes are required, whereas others are saying that larger executive homes are not what is needed and rather dwellings suitable for one-person households should be provided.
- 5.10 A small number of representations supported the principle of small scale housing development to meet local needs within the rural settlements, primarily for local people and / or older people.

Policy 3 Rural Area

- 5.11 A significant number of responses to the consultation objected to development in the rural area on the grounds of potential adverse impact of the development on traffic flow, safety and road quality. Concerns were also raised in relation to increased air and noise pollution.

Policy 6 Physical and Social Infrastructure

- 5.12 As expected, infrastructure provision is a major concern. It is disappointing that no representation has been received from the Primary Care Trust and that the representation from KCC does not currently include any supporting evidence for the statements in its representation. Detailed information from KCC's Infrastructure Investment Finance Model (IIFM) is expected soon and it is understood that the delay in providing this information is because of resource limitations.
- 5.13 Many respondents raised concerns in relation to the capacity of the existing infrastructure to cope with the proposed additional development. There was a particular concern that certain services and community facilities in the respective settlements would be unable to cope with further housing.

Policy 16 Strategic Sites

- 5.14 A significant number of respondents queried why the Council was considering Greenfield and Green Belt development when no dwelling capacity had been assumed at Lord Street / Parrock Street.

6. What has changed since the interim consultation documents were produced?

Policy

- 6.1 In November 2011, the Government published "Laying the Foundations: A Housing Strategy for England"¹ 21 November 2011 – The executive summary for this report contains 28 paragraphs including the following two paragraphs which include some potentially important statements of central government policy which have been emboldened:

¹ <http://www.communities.gov.uk/documents/housing/pdf/2033676.pdf>

- Paragraph 25. **This strategy is not about building more homes at any cost.** We know that the quality, sustainability and design of housing are just as important as how many new homes are built, and that getting this right is crucial if communities are going to support new homes.
- Paragraph 26. People want to live in a home and a place that they can be proud of. We are committed to improving the design and sustainability of housing in ways which give communities a say over the design of new homes and neighbourhoods. We are funding the Design Council to support communities in shaping development in their area, improving the energy efficiency of both new and existing homes, and **ensuring protection of the green belt and protected areas** as part of our commitment to sustainable development.

Evidence

- 6.2 **Ward level population projections** – Additional forecasting work was commissioned at the sub-district (ward) level to look at the population growth implications of building 5,200 dwellings in the Borough using different spatial distributions across the Borough. The report recognizes that whilst 5,200 dwellings is being used as the basis for additional technical work, this is just one of 6 options under consultation.
- 6.3 The deficit distribution was based on page 14 of the Greenfield and Green Belt Site Assessments and Options Report² It does not consider whether the sites are still available for future consideration:
- 6.3.1 Scenario 1 – 5,200 dwellings (Settlement hierarchy distribution) This incorporated additional development in Woodlands Ward (West of Wrotham Road) and Shorne, Cobham and Luddesdown ward (South of Astra Drive).
- 6.3.2 Scenario 2 – 5,200 dwellings (Overall site score distribution) This incorporated additional development in the following wards – Woodlands (West of Wrotham Road), Istead Rise (North of the Drove Way), Meopham North (Hook Green) and Meopham South and Vigo (South of Heron Hill, Culverstone).
- 6.4 The report also considered the demographic implications if development could be constrained to zero during 2011-2031 (scenario 3). This was intended to act as a control and therefore no account is taken of the sites with planning permission and accepted development potential.
- 6.5 The key points from the report are:
- 6.5.1 All scenarios show an ageing population, with a reduction in school age population.
- 6.5.2 The no-development scenario 3 suggests that there would be a reduction in population if there is no additional growth in dwellings.

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<http://localplan.gravesham.gov.uk/consult.ti/greenfieldbelt/viewCompoundDoc?docid=1157844&partid=1159380&sessionid=&voteid=&clientuid=4999649>

- 6.5.3 Scenario 2 shows a marginal increase in population in Istead Rise (4.6%) and Meopham (4.5%) but this assists in off-setting the otherwise larger fall in school age population.
- 6.5.4 Scenario 2 results in a marginal increase in those over retirement age (and those aged 80+) in Istead Rise and Meopham.
- 6.5.5 All scenarios suggest that we need to be looking at the accommodation needs of older people in these areas compared to existing housing stock to enable people to stay in their own communities over time.
- 6.5.6 All scenarios suggest that there is a need to look at longer term service provision for an ageing population in these areas, including health care and support services.
- 6.6 The ***Draft SLAA update consultation and draft SLAA addendum*** was published at the start of consultation but because of the short timescales it was not brought to Cabinet before publication. The draft SLAA addendum indicates that a 5 year supply can be identified against a requirement of 5,200 (for 2011 to 2031) but that we do not have a 5 year supply against the SE Plan requirement which is the formal target at the moment.
- 6.7 ***Latest information on Gravesham's economy*** - The size and weakness of Gravesham economy is part of the rationale for maintaining the area's supply of employment land. This is reinforced by the IPPR North's analysis of ONS figures has found that in some areas there are twenty job seekers chasing every job vacancy. This has been a big issue in the local press. The 10 worst areas are listed and Gravesham is number 10 with 12 jobseekers for every vacancy in Gravesham. This is the same as Middlesbrough and it is higher than North and South Tyneside, Bradford, Blackpool and Liverpool. Another measure of the economy is job density which is the ratio of jobs to the population aged 16-64. The latest data from NOMIS is that the Borough's job density is much lower than the SE average of 0.80. Gravesham's job density is 0.51 compared to 0.89 for Dartford, 0.61 for Swale and 0.57 for Medway.
- 6.8 ***Evidence supporting Kent and Medway Housing Strategy*** - DTZ and the Social Innovation Lab for Kent were commissioned to undertake quantitative and qualitative research into existing and future housing provision for, and aspirations of, older people. This report was completed in September 2011. Key extracts from the report are located in Appendix C of this report. The report's findings raise and provide significant detail of issues important for the LDF which have not previously been clarified relating to housing for older people, which is increasing, their differing expectations and the growth of older owner occupiers.
- 6.9 Also in Appendix C are extracts from the Kent Rural Housing Protocol which was published in June 2011. This was produced in response to the Kent Forum Housing Strategy's identification of a lack of affordability of housing in rural areas as a key concern for Kent. It recognises that local public opposition to new development can either block development completely or cause lengthy and costly delays to development.

Sites

- 6.10 **North East Gravesend** – As a result of the evidence available at the time, development was not considered at this location in the consultation document. Since this was written, discussions have been on-going regarding two live planning applications lying within an area covered by Policy PM9 of the adopted Gravesham Local Plan First Review (1994). Both Natural England and the Environment Agency have withdrawn their objections to these applications and the Council has now resolved to permit them subject to Appropriate Assessment and resolution of outstanding issues. This is now a material consideration with respect to how we approach North East Gravesend in terms of accommodating development and the rolling in of the Green Belt.
- 6.11 To ensure consistency between responses on the above applications and the LDF consultation, Natural England and Environment Agency have been asked to clarify their position regarding the remainder of the land at North East Gravesend lying between the existing Green Belt boundary and the PM9 policy area – i.e. the ‘white land’ covered by the AP19 policy area. They have both confirmed that withdrawal of objections to Dalefield Way should not be taken as setting a precedent for further land releases within the AP19 policy area.
- 6.12 **Heritage Quarter** – As advised in the draft SLAA³, 250 dwellings was an initial estimate of capacity for the scheme. Edinburgh Housing are confident that their revised scheme can deliver significantly more units whilst reducing the height of the buildings close to the church and reducing the overall size of the development⁴. Therefore an increase yield on this site of 350 units is counted in Appendix A as the scheme is still under development.
- 6.13 **Ebbsfleet** – Representations from Land Securities restate the broad outline of the planning permission and support identification of Ebbsfleet as a location for development, but want Springhead / Northfleet Rise considered together so that more residential can be provided at Springhead and more employment at Northfleet Rise. The current implication is that major employment development is unlikely in the current plan period which has a number of knock on effects on the overall strategy. The recent marketing of offices at Stratford that will become available after the Olympics, reinforces our assumptions that significant office development is unlikely at Ebbsfleet before 2021. Land Securities have been contacted to clarify whether they anticipate this desired change would reduce the dwelling capacity and / or infrastructure provision, and a response is expected soon.
- 6.14 **Northfleet Embankment East (NEE) masterplanning** – Representation from HCA supports 150 dwellings for this site but subsequent masterplanning shows that 200 dwellings could be accommodated. Careful design will be needed for residential development in this location to ensure proposed business operations are not impeded or residential amenity compromised. This is because a multi-modal freight hub taking international freight, this is not theoretical as there is already international freight traffic using HS1, will need high security and high intensity and visible security / lighting.
- 6.15 The Government’s policy on Strategic Rail Freight Interchanges⁵, which was published in November 2011, is worthy of note. Whilst NEE is smaller than the 60

³ <http://localplan.gravesham.gov.uk/consult.ti/SLAA/view?objectId=6075333>

⁴ http://www.g-h-q.co.uk/wp-content/uploads/2011/12/GHQ_newsletter_Dec_2011.pdf

⁵ <http://assets.dft.gov.uk/publications/strategic-rail-freight-interchange/strategic-rail-freight-interchange.pdf>

hectares recommended for a Strategic Rail Freight Interchange (SRFI) set out in the document, it also says that the Government also sees other types of rail freight interchange as being important in delivering its strategy (see part 5 at page 13 onwards). These include facilities for bulk material handling (i.e. Lafarge Bulk Aggregates Import Terminal which already has permission from KCC) and rail linked warehousing freight interchanges. The guidance also advises that the Government does not consider that the United Kingdom's current predominantly road-based system of logistics represents an economically or environmentally sustainable model for the future whilst highlighting that, to date, only one SRFI has been granted planning consent in the whole of the South East region. These policy steers are underpinning HCA/SEEDA's move away from more residential in the mix to achieve scale + functionality. It is still at an early stage but it is clear that the HCA see this as a strategic opportunity and it has a good fit in terms of delivering jobs and diversifying the economy whilst making better use of the River Thames for transport.

- 6.16 Protect Kent, for example, suggests that the Council rethink employment on this site as, in their general view, they can see no reason why this site would not be viable as a mixed use site with a larger element of residential development. However as highlighted in the consultation document and above, employment is a significant issue for the Borough and the Core Strategy needs to provide employment opportunity/diversity whilst capitalising on our significant river-related and connectivity advantages. The likely slow delivery of Ebbsfleet, with only minor employment before 2021, increases the need for the plan to be pro-active.

7. Request for guidance from Cabinet

- 7.1 Throughout the consultation process, in response to comments at the various public meetings and in the media, the Planning Delivery Portfolio Holder has been clear that emerging Central Government policy combined with an insufficient land supply was the reason that the Council had to consider developing on Greenfield and Green Belt sites. It was not a situation that he wanted.
- 7.2 As a result of the Localism agenda and the volume of representations received, Cabinet may want the Regulation 27 Core Strategy to clearly reflect public opinion whilst setting out a robust and defensible housing requirement, supported by evidence, without allocating Greenfield and / or Green Belt sites.
- 7.3 Notwithstanding the scale of representations received, it is likely that officers would have recommended the inclusion of Greenfield and Green Belt sites. In recognition of the need to undertake a Strategic Green Belt review before identifying the sites, this probably would have resulted in a quantity being assigned to the rural area specifically for older person accommodation with the sites being determined via the Site Allocations and Development Management Policies DPD as informed by a Strategic Green Belt review to be undertaken in 2013.
- 7.4 To enable work on the publication stage Core Strategy, officers need Cabinet to give a clear and swift guidance on their preferred outcomes to reduce potentially abortive work, whilst noting the important caveats below:
- 7.4.1 Appendix B is not comprehensive as officers have not yet been able to consider all the representation received. It must be regarded as work in progress. Before the Regulation 27 document is finalised, the issues raised in this and the January 2010 consultation will need to be given due

consideration. A number of these issues will require Member consideration and it is assumed that, to minimise delay, that this can be delegated to the Leader and Planning Delivery portfolio holder.

- 7.4.2 Additional Sustainability Appraisal and Habitats Regulation Assessment will be required and these will need to be taken into account when the final strategy is developed.

8. Potential outcomes for consideration in emerging Core Strategy

- 8.1 Based on the above, members may consider the following potential outcomes for further consideration and technical work.

Growth Level and plan period

- 8.2 **Potential Outcome 1 = Zero-net migration dwelling requirement** – It is recommended that this is the lowest dwelling requirement that should be considered for the following reasons:

- 8.2.1 The 2004-based, 2006-based and 2008-based Sub-national household projections which look at how the population of an area will change in the future if past demographic trends continue, indicate that we should be planning for 7,000 to 8,000 households.
- 8.2.2 The previous long-term migration projections produced by KCC (Sept 2009) showed a requirement for 8,400 dwellings from 2006-2026 in comparison to a requirement for 4,600 from 2011-2031 in the July 2011 demographic projections. This represents considerable volatility in the migration assumptions.
- 8.2.3 The Office of National Statistics website advises that the headline population estimates from the 2011 Census are expected to be released in mid-2012. If past trends are true, this is likely to show under-counting and less out-migration than assumed via other data sources and therefore a greater dwelling demand. If the LDF programme were to be delayed beyond the release of these figures, the LDF dwelling requirements might have to be reconsidered and could increase.
- 8.2.4 Future housing demand may increase because of the following factors:
- HS1 services started in the recession but have been very popular. Reports prior to the introduction of the service assumed that the dramatic impact in journey times would make Gravesham increasingly attractive to London commuters and thereby increase housing demand. Once lending conditions improve, this is likely to be the case.
 - Housing benefit reform (universal credit) is expected to force families out from the most expensive inner London areas and Gravesham's increased connectivity and comparatively low house prices may increase the demand from buy-to-let landlords intending to house housing benefit claimants from those boroughs.

- 8.3 The representations show that most people assume population growth is from in-migration. Although it was explained in the supporting documents, it does not seem to have been taken into account that whilst we do have positive natural

change e.g. more births than deaths, the majority of the dwelling demand is from increases in life expectancy e.g. people are living longer and are not releasing their properties into the Market for new households which continue to be created.. This combined with divorce and people choosing to live alone results in an increase of 6,000 one person households for the period 2011-2031. This is more than the projected increase of 5,100 households for the zero-net migration forecast as there are reductions in some couple households.

- 8.4 Officers suggest that it would be inappropriate to adopt the lowest option of 4,600 dwellings for the reasons set out in the above paragraphs, and hence why the zero net migration is the recommended projection.
- 8.5 Empty homes - Whilst the Council is doing very well at getting these back into productive use and has exceeded its target, these do not count towards the dwelling target as they are not net additions e.g. their loss in the first place has not been counted
- 8.6 **Potential Outcome 2 = Limit plan period to 2028** – Officers have considered 2 options as the work for the Strategic Land Availability Assessment (SLAA) does not currently identify sufficient sites for the full plan period beyond the 15 years:
- Planning for the first 15 year supply of a plan looking to 2031 – with an expectation that the final 3 years will be covered by a future review or sites as yet to be determined
 - Limit the plan period to 2028
- 8.7 With the first option, the Council could/would be required to identify a broad area or areas for development between 2028 and 2031 if specific sites haven't been defined. This would not be necessary with the second option.
- 8.8 Consequently, it is recommended that the second option is the safest and it is the most transparent to the public. It also accords with the draft NPPF which advises in paragraph 24 that Local Plans should “be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date”.
- 8.9 **Potential Outcome 3 = Land supply be limited to regeneration sites, sites with planning permission plus small site windfalls** – The above 2 outcomes, would result in a requirement for 4,600 dwellings for the period from 2011 to 2028
- 8.10 The July 2011 demographic and labour supply forecasts report is supported by spreadsheets containing the single year data. This has enabled the revised zero-net migration projection requirement for 2011 to 2028 to be calculated as 4,600 dwellings, 4,520 households and a 4,500 increase in population. When the age groups are considered, it is projected that the 55+ population will increase by nearly 10,400. This is offset by significant reductions in the younger population bands.
- 8.11 The majority of the sites contributing to the 4388 identified supply in the draft SLAA addendum already have planning permission and / or a quantified scheme is known and has been counted in the land supply. Some of most significant site specific changes have been highlighted in section 6 above.

- 8.12 An assumption has been made on small site windfalls but further research on this issue is underway to ensure that any assumptions are robust and defensible. PPS3 Housing and the draft NPPF advises that an allowance for windfall sites can be counted so long as it is not in the first 10 years of supply.
- 8.13 Viability is an issue but primarily it indicates that the urban potential capacities assumed for the SE Plan are not deliverable and probably never were without significant public sector investment to offset exceptional costs and / or assumptions that no affordable housing is delivered. The work to date reinforces the capacities accepted on the sites and highlights that a blanket approach to increasing density would be problematic. As explained in the draft SLAA, the viability work considers notional sites at set densities within the sub-markets not actual schemes. Actual schemes may be viable and this would be considered through the planning application process and may require open book appraisal.
- 8.14 It should be noted that the West of Wrotham Road site was removed from the October 2011 draft SLAA because it was being consulted upon as part of the Greenfield and Green Belt site assessments. It will be included in the final SLAA, to be published at Regulation 27, as a site with development potential, as was the case in January 2010. It will be for Members to determine whether this site is included with the Core Strategy as a strategic allocation. However based on previous statements by Members in advance of them making a formal decision, it has been excluded from the land supply in appendix A.
- 8.15 As shown in appendix A, sufficient land supply can currently be identified to deliver the zero-net migration requirement if the plan period is 2011 to 2028 without needing to allocate Greenfield or Green Belt sites.

Strategic rationale

- 8.16 **Improved compliance with national policy** – This approach would enable the Green Belt to remain intact. Whereas development in the Green Belt to meet the 2031 requirement would need to be justified on the ground of special circumstances. The 2028 plan period would enable us to better reconcile two key requirements of national policy – meeting our housing requirement and safeguarding the Green Belt.
- 8.17 **Listening to the community** - It is recognised that there has been a massive response from the rural communities objecting to the development of sites in the Green Belt. Para 4.37 of PPS12⁶ explains that views of the local community count as part of the evidence informing the Core Strategy and therefore it is reasonable for the Council to consider whether it can identify a strategy that overcomes these objections.

Post-2028

- 8.18 This proposed reduction in plan period is likely to generate questions about our intentions for land identification post-2028. It is impossible to give a definitive view now because it will depend on what has been achieved in the Borough at the point of the Core Strategy review and what level of development land is required. At this point additional urban Previously Developed Land sites could have become available or are anticipated to do so.

⁶ Planning Policy Statement 12: creating strong safe and prosperous communities through Local Spatial Planning <http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps12lsp.pdf>

- 8.19 It will need to be recognised in the Core Strategy that the Core Strategy will need to be reviewed before the end of this plan period. It is suggested that at that time, the following options could exist for post 2028 development land supply
- 8.19.1 **Neighbouring authorities could take some of our need** – A problem with this is that at the moment, the Duty to co-operate is very weak and does not guarantee that housing could be decanted to neighbouring Local Authorities within the same housing sub-market. This could include the consideration of a joint Core Strategy with, for example Dartford, given that they have ample housing land supply due to previous significant Green Belt land releases.
- 8.19.2 **Suburban regeneration** – a number of existing housing estates are likely to be towards the end of their life by 2028 and could benefit from redevelopment, potentially at higher density. Funding would be a issue and the yield would not be significant.
- 8.19.3 **Strategic Green Belt review** – Core Strategy review could include a strategic Green Belt review and consider the need to identify “safeguarded land” to meet longer-term development needs stretching well beyond the plan period.

9. Risks and implications for further investigation

- 9.1 **Meeting quantitative dwelling need but not household need** - The HCA website advises that “An ageing society poses one of our greatest housing challenges. Most homes and communities have not been designed to meet people’s changing needs as they get older”. At the same time, emerging guidance is suggesting that whilst life expectancy is increasing, people will live longer in ill-health (CLG 2008). As people age, they are more susceptible to strokes, coronary heart disease, osteoarthritis, and dementia driving up demand for care services but especially demand for health. The Department of Health’s Projecting Older Person Population Information (POPPI) estimates that in Gravesham in 2030 over 4,500 people aged 65+ will be living alone with a limiting long term illness and there are equally concerning statistics for obesity, mobility, dementia, depression, self-caring and visual impairment.
- 9.2 If state funded care service provision were to be simply increased in proportion to population growth, public spending on care services would need to double between 2010 and 2026. Older people accounted for nearly 60% of the £16.1 billion gross current social care spend of Local Authorities in 2008/09
- 9.3 Many older people live in housing that is less than suitable, either because of the poor fabric of the property or its unsuitability for someone who is older and has a disability. It is estimated that a third of older people live in non-decent or hazardous housing. The impact of this can be seen for example in older people who fall. Injuries from falling are estimated to cost the state over £1billion a year – one in four falls involve stairs, and the majority take place in the home
- 9.4 Gravesham’s older people’s population is going to significantly increase over the next twenty years with the oldest age group, and hence that most likely to need support, growing faster than the rest of the population. The zero net migration projection to 2028 shows an increase of 7,700 aged 65+ including an increase of 4,850 person aged 75+. When this is considered in combination with virtually all

- the growth being single person households (5,200), there is a need for elderly accommodation.
- 9.5 When the sites with planning permission and accepted development potential in the draft SLAA are considered, it is apparent that there will be some provision of accommodation suitable for older persons but this is not meeting the scale of the issue. Also it is only in limited locations whilst the need is throughout the borough.
- 9.6 The Wanless Review, 'Securing Good Care for Older People', offered an analysis of people's preferences for housing and care. It illustrated that whilst there is a clear preference by older people to remain in their family home, many older people contemplate a move to alternative accommodation, although few people wish that to be residential care. Space is a concern and for many owner occupiers, two bedroom bungalows in their existing communities are what they would prefer.
- 9.7 There are many good reasons for promoting the development of a wide range of housing suitable for older people throughout Gravesham. Good housing reduces the demand for care and support and improves people's health. It can deliver economies of scale when care is needed. It frees up family housing given that the highest levels of under-occupancy are amongst older people. As highlighted by the recent Kent Housing Group research, increasing proportions of the older population in future years are likely to own their home and whilst many home owners will seek to stay in their existing home for as long as they can, even if it is over-large and difficult to maintain, the provision of suitable smaller accommodation for purchase could encourage some to down size and free up existing larger housing stock for families.
- 9.8 In conclusion, it is likely that insufficient provision will be made for older people's accommodation with the recommendations proposed in section 8 of this report.
- 9.9 ***Uncertainty of some landowners intentions*** – A number of major landowners did not respond to the draft SLAA update which informed the Draft SLAA Addendum and therefore there is uncertainty about their intentions.
- 9.10 ***Unable to identify a rolling 5 year supply of specific deliverable sites plus 20%*** - If we do not have a 5 year supply at any point, draft NPPF paragraph 110 advises that planning applications should be granted. It is suggested that the sites most at risk in such a situation would be urban Greenfield sites and Green Belt sites with developer interest, as indicated by the representations received from these landowners and their agents, employment sites and open spaces. It is not clear from the draft NPPF whether a Green Belt site with no other substantive objections would be protected since the implication is that the pro development stance would trump it. The Council is not alone in raising this as an issue, so it is hoped that the final NPPF document will clarify this.
- 9.11 ***Council cannot control ownership of market housing*** – The Kent and Medway SHMA which supports the Kent & Medway Housing Strategy recognises that Dartford and Gravesham operate as part of the London sub-market. A number of letters start something like "moved to Meopham / Culverstone etc. 50, 40 years ago / recently from London because of the green setting etc... so even if the Council can allocate sufficient land for housing, it cannot control who can purchase it unless it is affordable housing in perpetuity with the tenant determined using our rural allocations policy (Istead Rise not covered by this). People moving from London with equity can often afford higher house prices than Gravesham

residents thereby displacing them from the market and historically their needs have had to be met outside of the Borough. In the future, this may increase our need to plan for enhanced affordable housing provision.

- 9.12 ***Dwelling requirement is a minimum, not a maximum*** - Paragraph 14 of the NPPF requires local plans to be prepared on the basis that objectively assessed development needs should be met, with sufficient flexibility to respond to rapid shifts in demand or other economic changes.
- 9.13 ***Population decline in rural area*** – The sub-district level demographic forecasts indicate that with no development (scenario 3) all wards would experience population declines. In the urban area, sites with planning permission and accepted development potential will increase the population by about 5000 people but the rural area would expect a reduction of approximately 750 people.
- 9.14 Combined with the population ageing this is likely to increase pressure on existing health services. Reduced numbers of families living in the rural areas will increase the school catchments and travel to school (NB. KCC has been asked to provide school census data to see if this is already an issue for some of the rural schools)
- 9.15 Current policy in PPS3 allows local councils to set 'rural exception site' policies which allocate and permit sites solely for affordable housing in perpetuity for local people in small rural communities. This is where housing would not normally be considered appropriate due for example to policy constraints, such as Areas of Outstanding Natural Beauty. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.
- 9.16 Central Government is concerned that the rigid requirement for sites to be only for affordable housing limits local councils' options for meeting the full range of housing needs and discourages them from taking a wider view on the need for housing in those rural areas and considering the balance to be struck between the benefits of meeting housing needs and maintaining current constraints.
- 9.17 The Government's objective is to maintain the focus on affordable housing but give local councils greater flexibility to set out their own approach to delivering housing, including allowing for an element of market housing where this would facilitate significant additional affordable housing to meet local requirements.
- 9.18 ***Provision of infrastructure*** – Whilst the coalition government is sure that there are powerful financial incentives (New Homes Bonus and Community Infrastructure Levy (CIL)) to allow communities to experience the benefits of additional housing, a significantly reduced housing requirement will impact on the funding available for infrastructure. Much is expected from CIL but as shown by the draft SLAA most of the units identified have planning permission and would not be eligible to pay CIL.
- 9.19 The detailed Infrastructure Investment Financial Model (IIFM) data is still awaited from KCC but discussions with KCC prior to the consultation highlighted that all of Gravesham's schools were at capacity and therefore this is not an issue specific to the rural schools.
- 9.20 ***Council Tax*** - As highlighted above, a significant increase in one person households is projected and this is likely to negatively impact on our Council Tax

base if they remain in their existing houses as anticipated and the Council Tax discounts for single person households remain.

9.21 **Draft NPPF** – The draft National Planning Policy Framework was published on 25 July 2011 for consultation and as highlighted by the report to Planning Delivery Committee in September 2011 and the response to the consultation from the RTPI, the draft NPPF is ambiguous about the Green Belt in respect to the need to show a rolling supply of land and the presumption in favour of sustainable development (see appendix D). The National Planning Policy Framework: Myth-Buster⁷ which was published in September 2011 in response to the serious concerns expressed about the document includes the following fact:

- Myth: The Green Belt will be concreted over Fact: Not true. The new framework re-affirms the Government's commitment to maintaining Green Belt protections that prevent urban sprawl. Inappropriate development, harmful to the Green Belt, should not be approved. Legislation will also remove the top down pressure on councils to build on the Green Belt.

9.22 The requirement of the draft NPPF to demonstrate a 20% surplus of land supply over the 5 year requirement should have no effect on the trajectory and the overall land requirement. The aim of this is to ensure a larger pool of land early on to ensure delivery at the anticipated rate e.g. to prevent under supply rather than have an over supply but at least one representor has read this as a requirement to provide a requisite growth level + 20%.

9.23 Meetings with Ministers supposedly state that the NPPF once published will be clearer but until this happens the age of our plan and the lack of flexibility with our currently identified land supply and its significant reliance on complex Previously-Developed Land (PDL) sites which seldom are delivered when anticipated, must be counted as a risk.

9.24 **Lack of clarity over Duty to Co-Operate** – Dartford BC appear to have taken this as them needing to agree with our proposals which suggests a veto. It is unclear precisely what this means in practice, other than more than simple consultation and something that has to be reported in the Annual Monitoring report. There are numerous issues with this to be worked out. For example we could in theory ask Dartford to take additional dwellings for Gravesham (as part of the housing market sub area), but they have just adopted their Core Strategy. This illustrates two basic problems. LDF Core Strategies will be on different timetables and that in the past co-operation had a direct purpose – feeding into the production of the Structure Plan and/or Regional Plan.

9.25 A process in danger of being lost is that KCC, for its own or regional purposes, collected a great deal of information on a consistent basis as well as doing studies over areas much larger than districts. It has reduced its capability significantly in this area. Unless data is collected on a comparable basis it is very difficult to have a meaningful discussion between planning authorities on issues that do require a wider view than one district.

9.26 Also there is no common starting point, as the sub-regions Core Strategies / LDFs are at different points.

⁷ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1984490.pdf>

- 9.27 **Transparency versus providing ammunition** – Concerns have been expressed that we were not clear enough about the socio-economic implications of constraining the land supply.
- 9.28 The problem we had was that this was a consultation document. A number of sites were proposed but it was only expected that a couple would be required. This lack of certainty about the growth level and its spatial implications made it difficult for the Sustainability Appraisal to determine the implications apart from in a broad form. This will not be an issue for the Regulation 27 Core Strategy.
- 9.29 It should be recognised that the evidence published as part of the October 2011 consultation is likely to be used by objectors to the Council's decisions, once made.
- 9.30 **Outstanding work** – As highlighted in the section below, additional technical work is needed for the publication stage Core Strategy. This technical work has the potential to delay the on-going production of the Core Strategy. The additional transport work is the obvious concern but it is essential. The Highways Agency has advised that the new modelling work, using the Kent Thameside Model, will need to reflect the proposed development quantum and location accurately.
- 9.31 There is also the potential that the results of the studies, could give unexpected or conflicting advice in comparison with the current evidence.

10. Next steps

Additional work

- 10.1 The highly challenging timetable for getting the Core Strategy adopted has constrained the work that can be produced at each stage to that which is absolutely necessary.
- 10.2 The key focus for officers over the next couple of months will be drafting the publication stage Core Strategy, taking into account the comments received at this and previous consultations. The supporting evidence and related baseline and technical reports will also need to be updated.
- 10.3 The following additional work to support the production of the document is shown below:
- 10.3.1 **Windfalls** – As highlighted above, windfalls were not counted as part of the indicative supply. Work is underway to quantify and justify assumptions on small windfalls post the first ten years. For the purposes of the tables in appendix A, an assumption of 30 dwellings per year has been taken.
- 10.3.2 Also additional work is needed on the dwelling yield from sites with planning permission yielding less than 5 dwellings to ensure no double-counting.
- 10.3.3 **Commission Revised Population projections** – The July 2011 demographic and labour supply forecasts report is supported by a spreadsheet containing the single year data. This has enabled us to calculate the revised zero-net migration projection requirement for 2011 to 2028. The work to date includes an estimate to 2028 but this does need to

be projected. A dwelling-controlled district version and a ward distribution will also be required.

- 10.3.4 **Additional retail work** has been commissioned looking at a reduced housing requirement and updated expenditure estimates based on current retail circumstances and prospects
- 10.3.5 **Additional transport work** – the Kent Thameside Transport model will need to be rerun with a revised development pattern (residential and employment) to establish what the transport requirements will be. That said, it is expected that the model will be dominated by the development proposed in the adopted Dartford Core Strategy.
- 10.3.6 **Sustainability Appraisal and Habitats Regulation Assessment (HRA)** – the emerging Regulation 27 Core Strategy will need to be appraised and the results of this work will need to be taken into account by Members when the Regulation 27 document is considered.

Timetable for Core Strategy production

- 10.4 To enable the Core Strategy to be produced in line with our very tight timetable, it is assumed that the Leader and Planning Delivery portfolio holder will need to make some interim decisions in response to the issues being raised using their delegated powers.
- 10.5 It is proposed that the Planning Delivery Committee on 28th March 2012 is opened to all Members to discuss the emerging document and consider the issues raised by the consultation.
- 10.6 The draft Regulation 27 Core Strategy would then be brought to Cabinet in May for sign off before the consultation starts in late May / Early June.

11. BACKGROUND PAPERS

- 11.1 Growth Scenarios and Core Strategy consultation document and supporting documents available via the consultation portal
<http://localplan.gravesham.gov.uk/consult.ti/system/listConsultations?type=C>

IMPLICATIONS		APPENDIX 1	
Legal			
Finance and Value for Money			
Risk Assessment	Included within report		
Equality Impact Assessment	Screening for Equality Impacts		
	Question	Answer	Explanation
	a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community?	No	
	b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality?	Yes	
	c. What steps are you taking to mitigate, reduce, avoid or minimise the impacts identified above?		
<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>			
Corporate Business Plan			
Crime and Disorder			

Appendix A = Draft residential land supply table

SLAA UPDATE?	SITE REF	ADDRESS	Capacities	Planning Status + certainty (INCOMPLETE)	Dwelling mix esp. suitability for older persons / single person hhlds (INCOMPLETE)	Additional information
		Windfall estimate (30 per year for 6 years 2022-2028 (RESEARCH UNDERWAY))	180			
	GR163	Ebbsfleet Valley	858	Outline PP	Mixed-development	
	GR189	Canal Basin Area	650	Permitted Subject to a Legal Agreement	Flatted development	
Y	SLAA: 39	Northfleet Embankment West	532	Permitted Subject to a Legal Agreement	Mixed-development including flats on waterfront	
	GR117+ GR188	Heritage Quarter	350		High density flatted scheme in town centre location with good access to facilities	
	SLAA: 35	Land at Grove Road	200			
	SLAA: 16	Northfleet Embankment East - Option 1	200		Assume mainly flatted	
	GR080903	Clifton Slipways West Street West Off Bath Street Roundabout	145	Permitted Subject to a Legal Agreement		
	NEW SITE	North East Gravesend	130	Permitted Subject to Appropriate Assessment and Legal Agreement		
	GR234	Southfields School, Singlewell Road	98	Outline PP	Mixed housing development	Detailed planning application just submitted by Bovis 20111101
Y	GR050892	Christianfields Development (Phase 2) Ferguson Ave/Palmer Ave	94	Full PP		
	GR080360	Christianfields Fst (Phase 3), Christianfields Ave/Palmer Ave	92			
Y	GR080095	Gravesend Police Station Windmill Street 133	86	PP	Flatted development - town centre location with access to facilities could be attractive to elderly	It is understood that the site has been sold and expect flatted scheme to be implemented
Y	20100166	Dykes Pit Between 245 and 247 Dover Road	82	PP	Mixed housing development	
	GR080775	Valley Lodge Ifield Way	56	Full PP	Extra-care scheme	Completed
	GR080208	Clarendon Royal Hotel Royal Pier Road	50	PP	Flatted development - town centre location with access to facilities	
	SLAA: 87	M Block, Bath Street	35		Town centre location next to hospital would be an ideal older persons scheme	
Y	20101007	Wimborne House Taunton Vale	32	Full PP	Extra-care scheme	
	GR070421	7-10 The Grove	29			
	20100305	De Warren & Herewood Lincoln House, London Road	16			
Y	SLAA: 75	Transport Quarter	15			
	GR030926	76 Darnley Road Land north of	14			
	GR060666	Kent & Essex PH Old Road West Site of former	14	Permitted Subject to a Legal Agreement	Mixed development - flats and houses	20110429 = Application for renewal
	GR080367	128 London Road	14			
	GR090144	Former Chequers Inn Church Street	14	Full Planning Permission	Mixed development - flats and houses	Under construction
	GR070893	79/85 High Street	13			
	GR080526	41 & 43 Pelham Road	13			
	GR086	The Coachworks Glebe Road	13			
	GR199	Rear of 19-21 Queen Street	13	PP		20110994 = Application for renewal
	SLAA: 86	12 Darnley Road and neighbouring land	12			
	GR080035	5,7 & 9 Harmer Street	12			
	GR051093	131 - 135 High Street	12			
	GR090322	Unit 9 & 10 May Avenue Industrial	11			
	GR060751	Old Comrades' Club, 15/17 Queen Street	11			
	GR080146	The Smile Centre Jubilee Crescent	11			

SLAA UPDATE?	SITE REF	ADDRESS	Capacities	Planning Status + certainty (INCOMPLETE)	Dwelling mix esp. suitability for older persons / single person hhlds (INCOMPLETE)	Additional information
	GR041142	Fox & Hounds P.H. (no. 27) & 26, London Road, Site Of	9			
	GR080466	Ashfield College Road land adj.	9			
Y	GR081049	3 & 4 London Road Land To Rear Of	9			
	GR080624	46 Pelham Road	8			
	GR080634	Aercon Works Aercon House Alfred Road	8	PP	Flatted? Small site	
	20100726	128 Milton Road	8			
Y	GR214	70 Parrock Street	7			
	GR060703	29/31 Darnley Road	7			
	GR080953	19-21 Queen Street	7	PP		20110993 - Application for renewal
	GR040317	31 Harmer Street	7			
	GR050142	96 Parrock Street	7			
	GR080263	136-137 Parrock Street	7			
	GR081068	34 - 35 The Hill	7			
	GR070825	96 Springhead Road	6			
	GR080529	19 Pelham Road	6			
	GR080644	Sheldon House Valley Drive	6			
	GR090589	Thorndykes Nursing Home 94 Windmill Street	6			
	GR051077	15 The Grove	6			
	GR060674	Land at Christopher Centre Off Whinfell Way	6	PP		
	GR070069	Harvel Works, Harvel Street	6			
	GR080610	3 - 5 Queen Street rear yard	6			
	GR080683	20 Stuart Road	6			
	GR090407	The New College of Cobham Cobhambury Road	6	PP	Old person almshouses	
	GR090486	11 The Grove	6			
	GR910232	Tudor Close (adj)	6			
	20090277	27 The Terrace	6			
	GR080244	70 Hillside Avenue	5			
	GR020431	17 High Street	5			
	GR050787	98 & 99 Windmill Street	5			
	GR070681	17-19 High Street	5			
	GR080043	Land between 11 & 13 Elliott Street	5			
	GR080553	29-31a Dover Road	5			
	GR080657	32 - 34 Princes Street	5			
	GR090233	Land Rear Of 26 - 32 Queen Street Fronting Terrace Street	5			
	GR090614	Former Scout Hut, between 11 & 13 Harden Road	5	Full Planning Permission	Bungalows	Completed
	GR090711	Land East of Conifer Drive	5			
Y	SLAA: 52	Land at Alanbrooke/Trinity Road	5			Planning permission expired
	GR090145	Land To The Rear Of Chequers Inn Church Street	5	Full Planning Permission	Mixed development - flats and houses	Under construction
		Sites with less than 5 dwellings (SUM) (BEING CHECKED FOR DUPLICATION)	318			
		Total identified supply	4663			
		Zero-net migration requirement 2011-2028	4600			

Appendix B

Gravesham Growth Scenarios and Core Strategy – Response to Interim Consultation

(25th January 2012 version)

An interim consultation on the Gravesham Growth Scenarios and Core Strategy and supporting background documents took place from October to December 2011. This report is intended to give an overview of the comments received during the consultation period. It is not intended to outline every single comment received and this should be regarded as work in progress. This report has considered comments which have been received via our online consultation system, by email and in writing.

It should be noted that the questionnaire results contained in this report are only those uploaded via our online consultation system. Other questionnaires have been received via e-mail and in hard copy, and the results of these are not yet available as they need to be entered into our consultation system.

The comments below have been re-assigned so that they relate to the most relevant sections of the consultation document. Where comments have been received on the supporting documents, these have been re-assigned against the relevant section of the Gravesham Growth Scenarios and Core Strategy document, except in the case of some comments on the draft Strategic Land Availability Assessment which do not fit easily elsewhere.

Some comments are attributed to parish councils, developers, statutory bodies and local interest organisations. They are not necessarily the only respondents making these comments and the document is not intended to include every comment that these organisations have made.

General Comments

One respondent considers that the proposals are positive and well considered and not “sticking plaster” solutions to problems. The abandonment of the South East Plan is an opportunity to take a more imaginative and inventive approach. Planning for the future of Gravesham needs to take into account factors such as changes to industrial production and retailing as well as the presence of Ebbsfleet Station. There should be more flexibility, particularly for brownfield sites, where design should allow for the flexible use of buildings and there should be a mix of uses.

The Council should wait for the outcome of proposals for a new river crossing, a hub airport and road/rail connections before deciding where to build more housing.

Is Gravesham challenging the need for a 5 year housing land supply?

The document is technical and is not easy to understand/analyse (Meopham Parish Council, Urban Gravesham and others).

No Habitats Regulations Assessment has been carried out. This must be provided before submission (Kent Wildlife Trust)

The sequential approach should be embedded throughout all the policies involving flood risk. For those sites identified in the Thames Gateway Delivery Plan it is understood that the sequential test will be considered adequately demonstrated however it will be necessary to demonstrate that these sites are safe under Part C of the exception test. (Environment Agency)

There need to be policies on the following:

- Provision of utility infrastructure (Southern Water)
- Water Resource Management (Southern Water)
- Protecting Amenity (Southern Water)
- Sustainable Urban Drainage Systems (Environment Agency)
- In addition, the document needs to be proofed against the loss of the South East Plan policies (Kent Downs AONB Unit).

It is not clear how previous comments regarding retention and enhancement of best and most versatile wharves, flood gates, access, renewable energy, the use of the river and continuation and expansion of existing river related employment uses have been addressed (Port of London Authority)

As a result of the need for changes to the spatial objectives and policies, additional consultation should be undertaken before the plan is finalised (CPRE)

Section 1 Introduction

Draft National Planning Policy Framework

A number of comments have been received in response to the section on the draft National Planning Policy Framework including:

- Objection to the presumption in favour of sustainable development and concern that this could lead to unwarranted development in the wrong areas
- There should/should not be a brownfield target for housing development
- Objection to the need to allocate an additional 20% of sites against 5 year housing land requirements
- Removing national minimum site size threshold for affordable housing is a license to build more unaffordable housing
- Objection to the removal of the rural exception sites policy
- Community Right to Built schemes should not be an option in the Green Belt

Evidence Base

The following documents should be referenced:

- Kent Thameside Strategic Flood Risk Assessment
- Kent Thameside Water Cycle Strategy (Environment Agency)

Section 2 Growth Scenarios

Scenarios Considered

The following additional/amendments to the proposed scenarios have been suggested:

- Mean of the 6 scenarios
- 2011 census data should be used
- Make an allowance for a 20% surplus as advocated by the draft National Planning Policy Framework

The following issues/concerns have been raised:

- The population growth and migration assumptions are flawed
- Is there evidence that South East Plan levels of development are feasible? If not, they should not be used
- There will be further out-migration from the Borough due to the lack of employment opportunities
- There is a question over the number of dwellings proposed compared to the forecast population growth and the implications of this on the size of any new dwellings

Preferred Scenarios

The questionnaire results received via direct entry into our online consultation system were as follows:

Which growth scenario do you think the Council should progress?

Historic Build Rate – 4,700 dwellings	8
Structure Plan Strategy – 5,900 dwellings	2
Zero Net Migration – 5,200 dwellings	4
Long Term Migration Trend – 4,600 dwellings	28
South East Plan Strategy – 9,300 dwellings	2
South East Plan Option 1 – 9,900 dwellings	1
None of the above	13

More generally in terms of the Council's preferred Zero Net Migration (5,200) growth scenario, the following comments have been made:

- It is a reasonable approach (Highways Agency)
- It is a significant drop from that in the South East Plan. While there may be challenges in bringing forward brownfield sites which may justify such a reduction, it is important to capitalise on previous and current investments and try to overcome obstacles as well as keep the original Thames Gateway Vision (Homes and Communities Agency)
- It would have implications for the Strategic Transport Infrastructure Programme for Kent Thameside and will reduce the level of developer contributions/income for this and Fastrack (Dartford Borough Council)
- It is likely to increase housing pressure in Dartford (Dartford Borough Council)
- It would fail to deliver an adequate supply of housing in line with recent Government household projections and does not facilitate the continued economic regeneration of the Borough, and places an over-reliance on complex brownfield land (Bovis and Persimmon Homes)

- It is contrary to the advice in the draft National Planning Policy Framework as it fails to take account of migration and falls below the latest sub-national household projections (Edinburgh House)
- Concerns about the assumptions that underpin it in terms of the feasibility of high density development in the urban area

Many are supporting the Long Term Migration Trend figure (4,600) on the basis that it is the lowest figure and they do not want development in the Green Belt (Higham Parish Council, Meopham Parish Council, Cobham Parish Council and others). The figure also derives from what has actually happened in the past and is considered to be the best indicator of long term trends. There are few plans for improving the local economy which has taken a downturn. Kent County Council submitted a written response supporting this figure unless studies can demonstrate that a higher figure can be accommodated within the urban area. CPRE also consider this to be the most acceptable figure but consider that the Kent Forum methodology should be applied to ensure that other policy objectives are taken into account.

There is some support for a dwelling target of 4,700 as it is the most realistic option. It is considered that the South East Plan and Structure Plan targets are no longer realistic, 5,200 is an unrealistically high level and 4,600 would risk under-provision if the migration trend changed. (Shorne Parish Council, Dickens Country Protection Society)

The owners of some of the Green Belt sites support the South East Plan growth scenario (9,300) or an increase on this figure. Gravesend is an important strategic location within the Thames Gateway and the South East Plan is the only robust and credible option. It is suggested that there is a need for significant housing development and the release of major sites is needed.

Alternative amounts of 2,500, less than 3,000, 4,000, 4,200 and 4,500 have been suggested. There is also the suggestion that the figure should reflect the amount of dwellings that can be accommodated on brownfield sites without the need for developing Green Belt or greenfield sites. There are also questions over the need to build any more houses in the area given the lack of jobs and the overloaded infrastructure.

Section 3 Viability Issues

The following comments have been received in relation to viability issues:

- Site viability assessments in the SLAA are fundamentally flawed and lack flexibility
- The viability of sites is subject to change and there is no justification for seeking sites in the Green Belt (Kent County Council). It may not be reasonable to use a worst case scenario. A longer period should be considered for taking into account dwelling values in relation to the viability of sites, e.g. can the assumption of an economic upturn after 5 years be considered? By then, the viability of brownfield sites will have changed
- House prices are forecast to increase up to 2016 and the evidence does not justify a reduction in housing provision (Dartford Borough Council)
- There is an over reliance on current day financial viability analysis. A high density scheme at Heritage Quarter is viable certainly in the next 2 – 3 years (Edinburgh House)
- High density housing can have high residual values, especially if they are boldly designed and attractive
- The size of the housing affects viability. The current population is seeking family housing rather than one bedroom flats. However, another respondent suggests that

smaller dwellings will be required once the recovery starts as this is what people can afford. The shortfall for older people's dwellings could be met by smaller dwellings.

- The owner of a Green Belt site states that it is no longer feasible to build high density urban sites and there is now a market preference for lower density developments. The Council's previous assessment of housing land is over optimistic and the release of greenfield / Green Belt sites will be necessary
- A moderate proportion of high density dwellings in the town centre can be built with no provision for car parking and with a covenant that debar owners/tenants from owning a car (or, alternatively, applying for a parking permit). This will make high density urban development feasible even in the present housing market (Kent Green Party)
- A number of the assumptions that underpin the viability study are challenged (Urban Gravesham)

Section 4 Spatial Implications of Growth Scenarios and Viability Issues

Any comments in relation to this have been addressed in other sections of this document.

Section 5 Spatial Vision

A number of comments have been made on different elements of the spatial vision. Some of these re-iterate objections to development in the Green Belt and others seem to have missed the point that the vision is where we want to be in 2031 rather than where we are now.

The following comments have also been made:

- There is a need for commuters – they spend money on housing and shopping in the area
- High unemployment and low paid jobs means that people cannot afford to travel large distances so development in the rural area is inappropriate
- Need to consider the house size implications to allow people to work at home
- Urban regeneration is supported, including well designed, sympathetic housing
- No commitment to reducing carbon footprint
- A227 needs to be enhanced
- Gravesend town centre should continue to improve
- Support reinstatement/improvement of the Thames and Medway Canal (Thames and Medway Canal Association)
- There is no reference to the role of wharves in Northfleet nor to the use of the river for sustainable transport (Port of London Authority)
- A strategic assessment of alternative options for the distribution of development has not been produced (Dartford Borough Council)
- The Sustainability Appraisal shows that it is hard to see how the vision will be achieved and that not enough weight is given to environmental matters, e.g. landscape, biodiversity, Green Belt protection, climate change (CPRE)

Section 6 Spatial Objectives

The objectives should be reviewed to reflect the changed vision.

Section 7 Proposals Map

No comments

Sections 8 – 9 Policies 1 – 2 Spatial Strategy, Settlement Hierarchy and Urban Area

In terms of the overall spatial strategy, there has been a significant level of objection. Many respondents consider that brownfield sites should be developed first before releasing greenfield and Green Belt land. This is more sustainable than locating development in the rural area, the infrastructure can cope, the environmental impact is minimised and urban regeneration can be assisted. There are suggestions that development should be confined entirely to brownfield sites.

There are the following concerns with the proposed approach:

- Gravesham does not have room for growth and expansion as it has reached or is exceeding sustainable levels of development
- The strategy of dispersal does not take into account the form, functioning and environment of existing settlements and is not sustainable (CPRE)
- The provision of residential only sites in the rural area, with less extensive public transport, is less sustainable than urban locations and could have a greater impact on the strategic and local road network (Highways Agency and Kent County Council)
- The reduction in residential development in the urban, brownfield locations means that there could now be an imbalance in residential and employment development at the mixed use strategic sites (Highways Agency)
- A strategy which limits residential to brownfield sites will increase commercial land prices and reduce the opportunities to secure employment due to the limited availability of such land (Stema Shipping)
- The projected population growth, social needs and how these translate into housing need, number and size of dwellings should be included.
- There are insufficient jobs locally and job creation is needed. Housing should be provided where the jobs will be. There are some concerns that the development of housing will not be matched by an increase in employment. The lack of employment opportunities could lead to further out migration, further reducing the requirements for housing
- Areas of flood risk should be avoided
- Local authorities should work together to address development requirements and some suggested that Gravesham's housing requirements could be met in Dartford given the scale of opportunities at Ebbsfleet and Eastern Quarry

In terms of brownfield land within the urban area, the following suggestions have been made:

- Focus should be on regenerating the run down areas, e.g. council estates on the edges of town
- Priority should be to bring back into use the empty homes in the Borough and there is a need to take into account all the empty homes in the south east
- Upper floors should be used
- The Council should be more proactive in securing the key, large scale, strategic urban sites and to work with Dartford in meeting the planning objectives for Kent Thameside (CPRE)
- Economic growth, regeneration, employment and social well-being should be given priority ahead of housing on the riverside sites. Priority should be given to

manufacturing/industrial development over office development. Incentives should be offered to attract businesses to these sites

- The approach should take into account Gravesend's unique geological and historical assets and capitalise on them to make the area attractive to visitors. The approach should protect open space, improve local assets such as Rosherville Gardens, improve the leisure offer and provide more traditional family housing

A number of housebuilders/developers support meeting development needs up to 2031 within or on the edge of the Tier 1 Gravesend/Northfleet/Ebbsfleet urban area as this is more sustainable than smaller settlement extensions (Bovis and Persimmon Homes, Rochester Bridge Trust, Mr Rossi). However, there is some concern about the impact of locating residential development on the edge of the urban area on the Heritage Quarter development (Edinburgh House).

Section 10 Policy 2a Gravesend Town Centre

Vision and Policy

The questionnaire results received via direct entry into our online consultation system were as follows.

Do you agree with the vision and policy for Gravesend Town Centre?

Yes	21
No	12

There was general support for the vision/policy from a number of respondents including comments that it would support the provision of more residential accommodation, help business development, improve access to the river and promote sustainable transport (Port of London Authority and others).

There is a view that the vision/policy should seek to provide a different and unique offer for the town given its historic environment and riverside setting (and that the Heritage Quarter and Transport Quarter schemes fail to do this). It should be noted that Urban Gravesham advocates the production of a Town Centre Area Action Plan. The more detailed concerns raised are set out in the subsections below.

Retail, Business and Residential Uses

In terms of retail, business and residential uses, the vision/policy should:

- support and encourage existing and new retail outlets and small businesses to provide jobs and services for local people,
- place greater emphasis on improving the quality and diversity of the local retail offer including specialist/independent shops rather than attracting large multiple retailers and modern units. This should take into account the rise in internet shopping, uncertainties over retail demand, increased competition from supermarkets and the presence of Bluewater (Urban Gravesham and others). The town centre should

provide for an alternative experience whilst retaining adequate provision of convenience goods for those who need this.

- abandon the town centre/retail schemes
- Heritage Quarter should be specifically referred to (Edinburgh House)
- identify the amount of comparison retail development taking account of the Council's baseline comparison growth forecast, the heritage constraints, the character of the town centre and the role of Bluewater. (John Lewis)
- consider reducing business rates to encourage new and protect existing local small retailers.
- allow for the introduction of more housing including the possible conversion of retail premises to residential use

Leisure Uses

In terms of leisure uses, the vision/policy should:

- encourage an increased leisure offer with greater use of the waterfront
- improve the cultural offer including the enhancement of Woodville Halls
- focus on improving local amenities rather developing open spaces resulting in further overcrowding.

Transport and Parking

In terms of transport and parking, the vision/policy should:

- ensure that sufficient parking is available to ensure accessibility to facilities (Shorne Parish Council, Dickens Country Protection Society and others)
- ensure that bus services can easily access the heart of the town centre as this is important to traders and customers and ensures that local bus services continue to be and become more attractive as an alternative to the car (Arriva Southern Counties)

Design and Heritage

In terms of design and heritage, the vision/policy should:

- recognise and preserve the unique qualities/character of the town (Urban Gravesham and others)

- ensure that new development is carefully designed to be in keeping with the scale and context (Kent County Council)
- improve links with the riverfront, including through development of Horn Yard
- improve the impression of the Town Centre given from the arrival points
- provide biodiversity enhancements (Kent Wildlife Trust)

Boundaries

The questionnaire results received via direct entry into our online consultation system were as follows.

Do you agree with the boundaries on the Map?

Yes	22
No	9

Support for the proposed boundaries (Shorne Parish Council, Kent County Council)

The following concerns/proposed changes have been raised:

- They only reflect the current position and show no ambition to improve the viability of the eastern part of the Town Centre (Urban Gravesham)
- Heritage Quarter site should be identified as “Primary Shopping Centre Extension” and text amended accordingly (Edinburgh House)
- Extend the secondary retail frontage to the riverfront to include properties north of West Street between Bath Street and Queen Street, incorporating what was Riva Restaurant as this area has the potential for visitors from the Towncentric/St. George-Pocahontas area to make purchases and dine as well as passengers from riverboat traffic

Section 11 Policy 3 Rural Area

A substantial number of objections have been received in relation to both the principle of development on greenfield / Green Belt sites and the proposed sites (all Parish Councils and others). These are dealt with in more detail in the subsections below.

There was some support for limited housing in the rural area to meet local needs as well as for windfall development. One respondent supports some well designed development on sites which are supported by existing infrastructure whilst opposing infill development. Another respondent supports potential development at Istead Rise which should be allowed to grow.

There was also the suggestion that the strategy should give consideration to:

- the role of Culverstone Valley – a fair and reasonable approach should be taken towards unrecognised land owners who are surrounded by developed land
- the need for owner occupied retirement housing in the rural areas of the Borough as there are currently none
- providing small sites for rural based workers which would be sustainable

Method for Selecting Additional Sites if Required

The questionnaire results received via direct entry into our online consultation system were as follows:

Which of these 2 methods do you think should be used to select additional sites if required?

Using the settlement hierarchy as the main consideration	11
Using the overall site score as the main consideration	6
Neither	19

Those who answered “neither” suggested:

- Any other method which retains the Green Belt
- Need to look at sites individually
- Build on brownfield sites before even considering greenfield / Green Belt sites
- Limit building so that no additional sites greenfield / Green Belt sites are required

Support the settlement hierarchy approach but do not support the release of Green Belt land for development (Cobham Parish Council, Shorne Parish Council, Dickens Country Protection Society)

A number of developers support the settlement hierarchy approach (Bovis and Persimmon Homes and Rochester Bridge Trust) and it is considered that additional development should be via a single strategic Green Belt release at Gravesend rather than within the rural settlements (Rochester Bridge Trust). Some also support the proposed release of greenfield and Green Belt land to meet housing need though others object to this.

Green Belt Boundary Changes – North East Gravesend and A2

A number of respondents support the proposed changes to the Green Belt boundary extensions, in particular at North East Gravesend on biodiversity and operational grounds (Kent Wildlife Trust, Shorne Parish Council, Dickens Country Protection Society, Metropolitan Police Authority).

Those with a land ownership interest in the site at North East Gravesend object to the proposal to include it in the Green Belt. Insufficient evidence has been presented to justify its inclusion (Rochester Bridge Trust) and there should be further investigation of site development possibilities to determine whether flood risk and nature conservation issues can be overcome (Kent County Council)

There is an objection to the proposal to include land at the A2 in the Green Belt. This is because there may be a future requirement to extend or add buildings/structures in relation to the development of the cyclopark (Kent County Council). Others also object on the basis that it is poor quality land (Cobham Parish Council and others)

The point was made that adding to the Green Belt elsewhere does not make up for the loss of Green Belt sites to development.

General Comments – Site Selection

There were a number of criticisms of the way that the methodology of greenfield / Green Belt site selection was applied:

- Defensibility of the Green Belt and assessment of the sensitivity of the landscape are highly subjective
- More factors should be taken into account in scoring sites
- Site search was limited
- Assessment was at too high a level

There was some concern that housing payments by the Government to the Council provide an incentive for the Council to allow development in the Green Belt.

In terms of the methodology used to select sites, comments received stated that this needs to consider:

- Assessment against the **purpose of the Green Belt designation** including:
 - Openness
 - Preventing urban sprawl, e.g. avoid ribbon development, Gravesham could become an overspill of London, Thong would be engulfed by development
 - Avoid coalescence/strategic gap between settlements and merging of neighbouring towns, e.g. maintaining gaps between Meopham, Istead Rise, Higham, villages in Dartford Borough and Gravesend,
 - Take account of features such as incursion into the open Green Belt, ribbon-like development extending into the countryside
 - Permanence
 - Exceptional circumstances to justify building in the Green Belt.
- **Site deliverability and developability**, including mitigation measures that could be put in place to make a site suitable
- **Smaller sites**
- **Sites on the edge of smaller villages**
- **Sites on the edge of Strood**
- **Capacity and quality of services**, not just accessibility
- **Sustainable development/service accessibility criteria** are too narrowly defined. It should consider the relationship with other facilities, e.g. open space, leisure facilities, post offices. It should also consider how new development could impact on the overall function of key settlements, e.g. improve public transport, provide services/facilities. They also do not take account of the settlement hierarchy in that sites adjacent to tier 3 settlements are treated in the same way as those adjacent to tier 1 settlements.
- Have regard to **other environmental and physical constraints** in the scoring system
- **Agricultural land** grade, whether it is actively farmed and whether it would affect the viability of the remaining agricultural unit
- **AONB impact**, including increased recreational pressures
- The potential role of forming a **new recognisable feature** such as a substantial tree belt rather than just assessing the presence of existing features
- **Readily recognisable features** such as roads, streams, belts of trees or woodland edges are merely used as examples in PPG2. There is no clear justification for making some more important than others, e.g. road = strong, tree belt = weak, and tree lines do not provide an effective Green Belt boundary as they can be felled
- **Agree/disagree with discounting for lower scoring sites**
- **Distribution of sites as well as site scores**, i.e. allocations should cater for development in a range of rural settlements including tier 2 and 3
- **Sequential approach** should be used:
 - Urban regeneration/brownfield sites within the urban area
 - Undeveloped sites at the urban area but not in the Green Belt
 - All Green Belt sites (including smaller sites) at the urban area in preference to rural sites. Apply additional criteria to maintain “openness” and to prevent “merging” of settlements or “encroachment” into the countryside

General Comments – Proposed Sites

A number of objections to locating development on the proposed greenfield / Green Belt sites related to the impact on local infrastructure as follows:

- A227 is dangerous and congested and could not take more traffic. The cumulative impact on the A227 and the need for road and junction improvements would need to be assessed. Rural roads in Dartford Borough, at Trottiscliffe and at Wrotham Hill would also be affected.
- Car parking at facilities in the rural area are already stretched
- More congestion will lead to more air pollution
- School capacity
- Health centre/GP surgery/hospital/dentists capacity
- Water supply and sewerage infrastructure
- Electricity and gas infrastructure
- Availability of phone/broadband
- Inadequate bus services and impacts on the numbers of people using train services
- Waste disposal
- Police services
- How will infrastructure improvements be funded?
- Pressure could be placed on community facilities in Dartford and create pressure for new facilities in the Green Belt. (Dartford Borough Council)

Site Comments – Proposed Sites

Detailed comments from local residents and others have been received in relation to most of the proposed greenfield / Green Belt sites. These relate to a number of matters including:

- loss of good quality agricultural land
- presence of footpaths
- access roads and local traffic impact
- biodiversity impact
- landscape impact and results of the landscape assessment
- impact on conservation area
- impact on character of settlements
- defensibility of Green Belt boundary
- flood risk
- presence of gas and electricity lines
- presence of sewers
- loss of open/recreational space
- access to and capacity of existing services
- multiple site owners
- contaminated land
- affected by noise from roads and railways
- density of development
- appropriateness of affordable housing

Some of the residents disagree with the assessments for the sites in terms of defensibility of the Green Belt boundary; sustainable development/service accessibility and landscape impact. Some of the owners / potential developers also disagree with the way in which sites have been assessed. Alternative results have been put forward.

One resident supports development on Land North of the Drove Way, Istead Rise, providing it is to house local people at an affordable price.

Southern Water made comments in respect of the water and wastewater capacity of each of the potential Greenfield and Green Belt sites. Kent Wildlife Trust also provided comments on the biodiversity impact of development on each of the sites.

Site Availability – Proposed Sites

Owners / potential developers of the following proposed greenfield / Green Belt sites responded positively to either the Regulation 25 update consultation or the direct site owner consultation:

- North East Gravesend – existing site with resolution to grant planning permission
- West of Wrotham Road, Gravesend
- South of Astra Drive, Riverview Park
- East of Thong Lane, South of Rochester Road, Gravesend
- North of High View, Higham
- North of The Drove Way, Istead Rise
- West of Cheshunt Close, Hook Green (a number of the plot owners)
- South of Melliker Lane, Hook Green (some of the owners)
- South of Istead Rise (most of the owners)
- Lomer Farm, Meopham Green
- Steele's Lane, Meopham Green
- East of Conifer Drive, Culverstone Green

Owners / potential developers of the following sites either did not respond or responded that they had no interest in developing their sites for residential use:

- Gad's Hill School
- West of Norwood Lane, Hook Green
- South of Heron Hill Lane and East of Wrotham Road, Culverstone Green

Site Availability – Additional Sites

The following additional sites have also been put forward by owners / potential developers for potential development/removal from the Green Belt:

- Land near Chalk Church
- North East Gravesend – should not be taken out of the Green Belt
- Part of Southern Valley Golf Club, Thong Lane, Gravesend
- Land adjacent to Home Farm Cottage, School Lane, South of Lower Higham
- 64 Downs Road, Istead Rise
- Longfield Hill
- Site south of Shipley Hills Road, Meopham
- White Post Lane, Sole Street – could provide a convenience store and community facilities
- Culverstone Valley – using the undeveloped original plots would yield 50-100 dwellings, include Culverstone Valley Area within the settlement boundary of Culverstone
- Tigers Hall Farm, Whitepost Lane and Newlands Lane, Culverstone
- Whitehorse Wood, Commority Road, Vigo

There has also been some suggestion that the following sites should be included:

- Mid Kent Golf course, Wrotham Road, Gravesend
- Chalk marshes, Gravesend

Section 12 Policy 4 Climate Change

There is support for the following:

- Section in general (Kent County Council and others)
- Incorporating energy sustainability
- Using low carbon energy solutions for all development (Kent Wildlife Trust)
- Using the Code for Sustainable Homes, BREEAM standards and water demand management in new development (Southern Water and CPRE)

There is support for the findings of the Eco Assessment in terms of the potential of Northfleet Embankment to provide a supply of renewable energy and heat for Gravesham. This is a significant opportunity to pursue. (Kimberley-Clarke)

Another respondent considers that the Eco Assessment is incomplete as it ignores the carbon footprint/pollution/congestion impact of changing patterns of service locations and impact on travel to work and user patterns. It also does not mention water shortage in the South East and impact of rationing/shortages.

There is concern that the requirements of this policy should not stifle development (EIGP – Land Securities and Lafarge Cement)

Section 13 Policy 5 Design and Development Principles

There is support for the following:

- Policy (CPRE)
- Conclusions of the Urban Baseline Study (Edinburgh House) and the incorporation of its findings into site specific policies (Urban Gravesham)

There is some concern that the Urban Baseline Study fails to acknowledge the importance of the town's topography (Urban Gravesham)

It is considered that the policy should also include:

- The integration of policies from other sections in the Plan such as Climate Change and Environmental Sustainability.
- A requirement for community safety to be incorporated in all development, e.g. Secured by Design (Kent Police)

Section 14 Policy 6 Physical and Social Infrastructure

The infrastructure providers state the following:

- Strategic Road Network – an assessment of the overall impact of development on the strategic road network and of alternative options is needed. The impacts should be identified using a robust evidence base and mitigation measures should be included. Who will provide the necessary infrastructure, what the funding sources will be (including how any funding shortfalls will be addressed) and when it will be provided needs to be made clear. The Kent Thameside Transport Strategy and its supporting evidence base should be included and a review of current transport schemes carried out (Highways Agency)
- Highways – Concern that new housing in rural areas will be less sustainable than urban development and therefore there is a strong preference for development in the urban area. The effects of any change in strategy will be subject to further runs of

the Kent Thameside Transport Model. The information from this will identify the problem areas on the network and produce an updated Strategic Transport Improvement Programme. Additional work also needs to be done on an overall transport strategy (Kent County Council)

- Water and waste water capacity –Southern Water delivers strategic infrastructure and developers are required to provide local infrastructure. The requirement for the latter should be included in the policy. Support the production of an Infrastructure Delivery Plan which should include sewerage and water distribution pipes as well as water supply and waste water treatment. (Southern Water)
- Electricity – Network capacity for the region is adequate to meet the needs of existing customer demand. Whenever presented with new development proposals, they examine the proposal and its impact and provide an economic design for connection. The developer is required to meet the costs of this (UK Power Networks). National Grid also responded but raised no infrastructure issues
- Police – have previously provided a draft Policing Plan on Proposed Infrastructure Developments setting out staff numbers and non specific accommodation requirements as a result of population growth using the South East Plan scenario. Object that there is no requirement for developer contributions towards policing infrastructure. A detailed justification for and calculations of such contributions have been included (Kent Police)
- Flood Risk – Development in flood risk areas must consider drainage and SuDS (sustainable drainage) should be encouraged. The role of SuDS in managing flood risk and improving ground and surface water quality should be acknowledged. Reference should be made to an Area Flood Plan together with the requirement for applications in flood risk areas to be accompanied by a flood warning and emergency plan (Environment Agency)
- Schools – significant development in the urban area will require additional school capacity funded by developers. Pupil numbers could probably be accommodated within expanded facilities at existing schools (Kent County Council)
- Adult Services – vulnerable adults will in future be supported in their own home in the community. There will therefore be a greater need for more community hubs (Kent County Council)
- Community Services – library, adult education and youth services are being reorganised and it is difficult to identify specific requirements that will arise. As an alternative to new buildings, existing library opening hours may be extended, book stock/equipment increased and new mobile provision made whenever possible. This will enable the expansion of library services to offer additional youth sessions and adult education classes. (Kent County Council)

Kent County Council additionally state that they wish to continue the dialogue with the Borough Council on the implications for KCC services of development in the Borough, and to reflect the outcome in the Core Strategy, Infrastructure Delivery Plan and CIL charging schedule. They consider that:

- developers should be required to contribute towards land and build costs for infrastructure
- sites should be allocated for such uses
- CIL funding should be passed to KCC to fund schools, highways and other services

The following concerns have also been raised:

- Data underpinning infrastructure requirements is inaccurate as based on an urban focussed strategy.
- Does not support the reference to “demand management” as a basis for determining whether physical and social infrastructure may be lost (Dickens Country Protection Society)

- Community infrastructure needs for the dispersed pattern of development are not known, nor how they will be provided, nor the role of facilities in Dartford (Dartford Borough Council)
- No reference to the potential impact of the new CIL regulations and how the Council propose to use them. (Urban Gravesham)

Section 15 Policy 7 Green Infrastructure

There is some support for the policy approach (Kent Wildlife Trust, Kent County Council), including the principle of identifying areas of value for sport and recreation within the site allocation policies and bringing forward proposals for new sites to address deficiencies (Sport England).

There are concerns that there is little/no reference to the following:

- Accessible Natural Green Spaces (Natural England)
- Area of Outstanding Natural Beauty (Kent Downs AONB Unit)
- Value of ancient woodland habitats (Woodland Trust)
- The role of river and water networks, their maintenance and enhancement (Environment Agency)

The need to allow for the delivery of necessary utility infrastructure (Southern Water)

The need to ensure that green infrastructure does not conflict with other uses such as the Metropolitan Police Specialist Training Centre (Metropolitan Police Authority)

There is a need to clarify whether the policy deals with all sports provision or whether indoor provision would be dealt with under policy 6. Also clarify whether the policy deals with non playing pitch outdoor sports (Sport England)

In terms of the policy implications of the PPG17 study results, the following issues have been raised:

- Future needs based on the preferred growth scenario will also need to be addressed (Sport England)
- A number of the facilities cited are outdoor rather than indoor facilities. (Sport England)
- Clarify that there is no overall surplus in the quantity of playing pitch provision. Supplement this with detail regarding the position for different sports and pitch types, any qualitative and accessibility deficiencies and key actions. (Sport England)
- The findings are noted and the Heritage Quarter scheme will look to make an appropriate contribution in quantitative and qualitative terms to the provision of open space (Edinburgh House)
- The need to expand the green space around St Georges Church to address the lack of access to amenity green space (Urban Gravesham)
- Provision/access to amenity greenspace, children's play areas, health/fitness facilities and community halls in Whitehill ward to address current deficiencies

Section 16 Policy 8 Heritage and the Historic Environment

There is some support for policy (Kent County Council) and some suggested changes to the wording of the policy (CPRE).

Section 17 Policy 9 Education Skills and Learning

No comments

Section 18 Policy 10 Economy and Employment

The questionnaire results received via direct entry into our online consultation system were as follows.

Do you support the position that, should a lower housing growth scenario be chosen as an alternative to that set out in the South East Plan, we should continue to plan on the basis of still creating a minimum of one net new job per dwelling with the main employment sites broadly distributed as per the original January 2010 Core Strategy consultation?

Yes	14
No	18

The following views have been received on the ratio of seeking a minimum of one net new job per new dwelling:

- Support (Shorne Parish Council, Dickens Country Protection Society and others) as it could help to reduce commuting (Highways Agency)
- Should not be applied too rigidly (Kent County Council, Lafarge Cement)
- Concern that it is unachievable as Gravesham’s economy is serviced based and employment development at Ebbsfleet is unlikely over the Plan period
- Basing employment provision on a ratio with housing could artificially restrict job growth/opportunities (CPRE and others). A more balanced mix of jobs and dwellings is needed on brownfield sites to ensure sustainability. (CPRE)
- Suggestion that the ratio should be increased to 1.5 or 2 per new dwelling

Employment strategy should seek to do the following:

- Regenerate strategic urban sites and improve the number and choice of jobs (Kent County Council)
- Encourage small businesses in Gravesend to provide jobs and services for local people
- Focus small and medium sized businesses in the town centre to diversity its employment base (Urban Gravesham)
- Raise the town’s economic profile in Europe
- Support economic growth/regeneration, which should remain a key objective (Lafarge Cement, Bovis and Persimmon Homes)
- Adopt a more pro-active and flexible approach to attract growth and development industries into the Borough to expand the range of job opportunities
- Address the need for more local employment for existing residents without automatically meaning that there is a need for more housing

There is an objection to the employment strategy on the basis that it should still seek to maintain the target of 10,000 jobs over the plan period. (Bovis and Persimmon Homes)

In terms of the Economy and Employment Space Study and Addendum, the following comments have been made:

- The table of indicative office floorspace delivery at Ebbsfleet does not adequately reflect the information provided (EIGP – Land Securities and Lafarge Cement)
- Questions the assumptions behind updated scenarios for future office development at Ebbsfleet, particularly the difference of 9 years between commencement in Dartford and in Gravesham (EIGP – Land Securities and Lafarge Cement)
- Support the inclusion of Land at Coldharbour Road for employment development (Capital Enterprise Centres Ltd)

Section 19 Policy 11 Retail Centre Hierarchy

The questionnaire results received via direct entry into our online consultation system were as follows.

Subject to the Council undertaking a targeted consultation on updated retail capacity analysis to cover the period to 2031 based on the chosen housing growth scenario, do you agree with the policy for the Retail Centre Hierarchy?

Yes	22
No	8

There was support for the following:

- the retail hierarchy/policy (Shorne PC, Dickens Country Protection Society, John Lewis and others)
- the identification of The Hive as a local centre and Northfleet Embankment West as a location for new retail and service development (Lafarge Cement UK)
- limiting new service provision in new developments outside the town centre to local services only (Arriva Southern Counties)
- encouraging retail outlets in Gravesend to provide jobs and services for local people
- the town centre first approach (Edinburgh House)

The following concerns were raised:

- The table of new retail floorspace requirements is meaningless as it does not have a baseline indicating the amount of existing floorspace in each category.
- Retail is more than just the amount of floorspace, it is about the quality and range of the retail offer which locally has declined
- It is over-optimistic for Gravesend town centre and does not reflect the current economic climate and trend in online shopping
- The policy should not restrict A1 retail to the Primary Shopping Area as this will limit the diversity of uses within the Town Centre. (Edinburgh House)
- Heritage Quarter should be identified as a Primary Shopping area extension suitable for a comprehensive town centre retail and mixed use scheme and as a major development site (Edinburgh House)
- Leisure matters should either be dealt with under policies 2a or 12 and retail matters should all be dealt with under policy 11 for clarification (Theatres Trust)
- Qualitative improvements to the local retail offer should be sought by capitalising on local assets such as the riverfront, to provide an alternative to Bluewater

Whilst Urban Gravesham agree with the retail focus on the town Centre, they do not support the vision.

The following comments in relation to Ebbsfleet have been made:

- No evidence provided on the impact of reduced and more widely dispersed population on retail patterns particularly in Ebbsfleet (Dartford Borough Council)
- The extant retail planning permission at Ebbsfleet should be reflected in the policy (EIGP – Land Securities and Lafarge Cement)

The following comments in relation to Imperial Retail Park have been made:

- Object to its categorisation as an “out of centre” location and clarification sought of the policy wording in respect of its expansion into the adjoining Business Park and the reference to it being a “centre” (Orchard Street Investment Management LLP)

- Object to it having a sequential preferable status in the retail centre hierarchy considering it is an out of centre site and has no preferential status in PPS4. Such an approach may impact on the objectives to regenerate the Town Centre. There is also the question over the justification for the loss of employment (Edinburgh House)
- It is unclear what the implications are for Imperial Wharf of the westward expansion of Imperial Retail Park. Retail development appears to be contrary to national policy for the protection of existing and potential infrastructure for the movement of freight (Port of London Authority)

Edinburgh House also seek clarification on whether sites within the primary shopping area and town centre commercial core are both considered as in-centre in terms of PPS4 and would wish to comment on the new retail work once it is available.

Section 20 Policy 12 Culture, Tourism and Leisure

There is some support for the following:

- A museum (Urban Gravesham)
- New hotel accommodation in the Borough; the town centre should be promoted as the location for this (Edinburgh House)

This section of the Core Strategy should also include:

- The scope for improving the cultural offer of the town centre (Urban Gravesham)
- References to Cobham Hall, Gads Hill House, Cobham Village, the North Downs AONB and parts of the North Thames Marshes (Dickens Country Protection Society)

There is some concern that:

- There should be no reduction in the amount of commercial leisure facilities as a result of revising down the growth scenarios (Edinburgh House)
- There is no need for more hairdressers
- Existing leisure facilities and the tourist information centre are poorly sited

Section 21 Policy 13 Residential Development

The following comments have been made in relation to the table of housing requirements:

- The reduction in the figures on brownfield sites from 5678 to 2871 in one year is inconsistent and questionable (Meopham Parish Council and others)
- It should include windfall sites which is predicted to be around 400 units over the next 20 years (Meopham Parish Council, CPRE)

In terms of affordable housing, the following comments have been made:

- The economic downturn and availability of mortgages means that there will be a need for more affordable, social housing with more bedrooms.
- There is a question of whether it is truly affordable
- Brownfield sites are the most sensible location
- The ability of complex regeneration sites in the urban area, e.g. Northfleet and Riverside, to deliver 30% affordable housing is questioned. This is due to viability and the need for it to be balanced against other demands. (Lafarge Cement UK)
- If built, it should be for people with direct connections to the settlement
- Provision should be made for key workers

The size of units is important and needs to meet present and future needs. The policy should refer to the mix/type of units on each site to meet these needs and to ensure that

developments are suitable and attractive for a wide range of residents (Urban Gravesham and others)

Consider introducing a house sharing scheme

Section 22 Policy 14 Gypsies, Travellers and Travelling Showpeople

The questionnaire results received via direct entry into our online consultation system were as follows:

Which of the following methods should be used to identify local pitch/plot targets?

Use the unfinished South East Plan Panel Report’s estimation of need for permanent pitches in North Kent and apply the North Kent Gypsy and Traveller Accommodation Assessment’s figures in relation to the distribution by area of need – results in the need for 13 permanent pitches up to 2016	2
Use the North Kent Gypsy and Traveller Accommodation Assessment of need and project the need forward using the North Kent Gypsy and Traveller Accommodation Assessment – results in the need for 11 permanent pitches up to 2016	17
Neither of the above	14

Responses to the above were mainly received from individual members of the public. The National Federation of Gypsy Liaison Groups was one of those which consider the South East Plan Panel Report’s figure should be used as these are the most robust, having been through the most scrutiny and addressing flaws in the GTAA. They do state that where any element of pitch distribution was proposed, this should only be taken forward where all local authorities are ‘signed up’ to that approach to ensure that need across the area is addressed.

Some respondents consider that 11 pitches should be the maximum provided (Shorne Parish Council and Dickens Country Protection Society).

The following responses were also made about the amount and location of sites for gypsies and travellers:

- Question over why any provision should be made
- Question over why there is a need for so many pitches in the Borough
- Only provide pitches for overnight/short stays
- No consideration has been given to the need for compensatory provision of gypsy/traveller sites for authorities with environmental and other constraints (Dartford Borough Council)
- Meeting needs could overcome illegal encampments
- Wait for the NPPF
- Lack of sites which will be acceptable to local residents
- Use the Old Tollgate Hotel site for pitches/plots
- To settle here, people should have a very strong link to the local area and strict criteria should be applied
- If brownfield sites cannot be found, Green Belt sites will have to be used and there should be strict criteria that any site must be at least 800m from the nearest existing residential development.
- The construction of travellers’ sites close to private housing sites would discourage development of the latter.

Some respondents have been given the impression that a travellers site is proposed at Istead Rise and object to this on the basis that there are already sites at Springhead Road and Dering Way.

Section 23 Policy 15 Transport

There is support for the following:

- Encouraging the use of public transport which reduces congestion on the roads (Kent Police)
- Approach to car parking (Edinburgh House)
- the Council's position in relation to wharves (CEMEX and others)

A number of concerns have been raised as follows:

- There is no reference to the economic impacts of HS1 (Urban Gravesham)
- There is no justification for the provision of commuter parking in the Transport Quarter (Urban Gravesham)
- The policy should provide principles to guide transport planning (Urban Gravesham)
- The Kent Thameside Transport Strategy and its supporting evidence base should be included and a review of current transport schemes carried out (Highways Agency)
- The need for public transport (rail and bus) should be assessed

A number of issues about the local public transport network were raised as follows:

- public transport is expensive and the evening and weekend service is poor.
- no cross town bus service which avoids the Town Centre
- no direct bus service to Maidstone
- public transport connections with areas outside the Borough is poor reducing opportunities to attract residents from surrounding areas.

Section 24 Policy 16 Strategic Sites

The strategic sites should be developed prior to greenfield and Green Belt sites. If greenfield land is required, Land West of Wrotham Road, Gravesend, should be the first priority choice.

The following should be included as strategic sites:

- East of Thong Lane, Gravesend (Rochester Bridge Trust)
- West of Wrotham Road, Gravesend (developer, Kent County Council and many residents in the rural area)

In terms of employment, the following comments have been made:

- Floorspace estimations are unrealistic
- Should be maximised
- Low job/hectare ratios should be resisted

The infrastructure providers make the following comments:

- An assessment of the water and waste water capacity shows that there are no fundamental reasons why any of the strategic sites cannot go ahead. However the existing sewerage capacity for most of the sites and existing water mains capacity for some of the sites is insufficient to accommodate the additional flows generated and required by the sites. (Southern Water)

- There should be provisions to ensure that these sites do not pose a future risk to groundwater resources and other sensitive environmental receptors (Environment Agency)

The Core Strategy should take into account any additional traffic generated by developments to minimise or exclude any negative impact on Swanscombe's infrastructure. (Swanscombe and Greenhithe Town Council)

Flexibility should be allowed in the mix/balance of uses on strategic sites to ensure their delivery. (Kent County Council)

Northfleet Embankment East

The questionnaire results received via direct entry into our online consultation system were as follows:

Which of the following options do you prefer for Northfleet Embankment East?

Option A: Mainly jobs plus minor homes	4
Option B: Fewer jobs plus modest homes	7
Option C: Only employment	2
Option D: Mainly homes plus limited jobs	16
None of the above	4

Responses to the above were mainly received from individual members of the public.

The following options are preferred by organisations:

- Option A – Homes and Communities Agency, Shorne Parish Council, Dickens Country Protection Society
- Option C – Kent County Council, Stema Shipping

A number of organisations want to see Red Lion Wharf safeguarded as a wharf (Kent County Council, Port of London Authority, Stema Shipping, Kimberly-Clark)

The following views were also received:

- Residential development opportunities in this location should be maximised
- The number of dwellings should be increased by 250 (Meopham Parish Council)
- Premature to support any option before other options involving residential development have been considered by the landowner (CPRE)
- Support for option A until evidence is available to support alternative options (Homes and Communities Agency)
- Concerns that there has been an overestimation of the potential for job creation, especially if transport related uses are proposed. This is at the expense of housing
- Development should be labour intensive and maximise the potential of the site (Shorne Parish Council)
- The site should be used for a mix of retail and jobs, possibly flats with retail space underneath
- The site should be used as a campus style area with good physical and visual access to the river

Ebbsfleet

The developer welcomes the identification of the site for development. Development is dependent on market conditions and this may require changes to the conditions. The policy

should consider the site as a whole rather than splitting the development. (EIGP – Land Securities and Lafarge Cement)

It is not clear whether the original role for Ebbsfleet is being maintained. (Dartford Borough Council)

There is support for office employment.

Residential development in advance of employment could be less sustainable than originally planned. (Highways Agency)

The numbers of dwellings and jobs proposed for the site are unrealistic and too optimistic. One respondent stated that he would not expect more than 1,000 jobs to be generated under this scheme. There is a need to reconsider the capacity of the site.

Swanscombe Peninsula

Swanscombe Peninsula should be included as a mixed use development. (EIGP – Land Securities and Lafarge Cement)

Retain flexibility for employment development in this location. Land within the respondent's ownership should be included within the proposed strategic development site for B1, B2 or B8 employment land use and not identified as open space as shown in the Swanscombe and Northfleet Riverside Study (Ryder)

The CEMEX aggregate wharf at Lower Road, Northfleet, should be safeguarded from future development/allocation of strategic sites, particularly if this is for residential or amenity use which would need mitigation against the effects of existing industrial uses (CEMEX)

This site was previously identified as being one of the least sustainable strategic sites. There is concern that intensifying this will exacerbate the problems results from this lack of sustainability. (Highways Agency)

Need to assess the case for an A226 relief road to serve development (Dartford Borough Council)

Northfleet Embankment West

Support the regeneration of Northfleet Embankment. (Lafarge Cement)

What the Council are doing to secure the continued operation of their premises? (WER Corrugated Ltd)

Unrealistic optimism of growth and dwelling requirements is shown by the proposals to reduce the capacity of the Grove Road part of the site from 400 to 200 dwellings. The capacity could be increased by 200 (Meopham Parish Council and others).

Comments have been received in relation to the biodiversity, heritage, recreation, sport and tourism, employment and place making value of this site, Northfleet Harbour and the River Fleet. These should be taken into account in any future plans for the area. (Northfleet Harbour Restoration Trust)

Town Centre

There are a number of responses about the amount of development put forward in the town centre as follows:

- there is a question over the validity of the employment floorspace and dwelling targets for the Heritage Quarter (Urban Gravesham) and the capacity of the site should be reconsidered
- concern about the downward revision of housing numbers for Heritage Quarter as this will compromise the viability of the scheme and its ability to deliver regeneration – capacity of 400 units should be retained and this could be increased if St Andrews Gardens were included (Edinburgh House)
- further dwellings could be accommodated by using derelict buildings, unused retail buildings and unused spaces above shops
- 488 dwellings is too many for the town centre when we need 3 bedroom family houses not 1 bedroom flats
- Site capacities should be set via miniature development briefs/urban design studies to show that development is at an appropriate scale for its context (Urban Gravesham)

The following should be included as town centre sites for residential development:

- Lord Street car park (Meopham Parish Council and others)
- Parrock Street car park (Meopham Parish Council and others), possibly to be used for a high density assisted living facility
- Former open air pool site in Ordnance Road
- M block

Canal Basin

Support this policy with the need to ensure comprehensive development (Countryside Properties)

The owner of the Canal Basin considers that its regeneration presents a one off opportunity to create a unique place which would positively benefit the town and community. Complete restoration of the canal is unlikely in the short term and controls should be put in place to prevent development which would impede full restoration. The owner supports sympathetic, mixed use development rather than simply housing at Albion Quay. It should become a destination with focal points of interest rather than a dormitory. (The Embankment Marina (Gravesend) Ltd and London River Mooring Ltd)

Reconsider the capacity of the site

Supports the reduction in dwellings to 650 but non-sensitive uses such as Class B1 and B8 should be located at the eastern end of the site to act as a buffer between the site and un-neighbourly uses at riverside east and beyond to the metropolitan police training centre. (Metropolitan Police Authority)

Section 25 Sustainability Appraisal

A number of comments have been made but these are not related to the results of the Sustainability Appraisal. They are re-iterating comments already made in relation to:

- justification for the level of both housing and economic growth
- inadequate consideration of the type of accommodation required, i.e. a range of dwelling types
- impact of growth on potable water availability

- Lack of good public transport links in the rural area and the need to focus development in areas with good links

Draft Strategic Land Availability Assessment and Addendum

The owner / potential developer of the land south of Coldharbour Road supports its inclusion as an accepted site for employment use. The option of a hotel/restaurant use on part of the site should be included. (Capital Enterprise Centres Ltd).

The Draft SLAA should include the following as potential brownfield sites which can be developed:

- Derelict pub sites
- Old Dairy, Rochester Road, Gravesend
- Former Tollgate Hotel
- Former service station on the A2

The following additional sites have also been put forward by owners / potential developers for potential development:

- Former AEI Cables Sports Club
- Royal Mail site at Queen Street
- Royal Mail site at The Grove

The following concerns have been raised:

- A higher density should be sought on sites: 40, 50, 60 and 70 dwellings per hectare have been suggested
- It is unrealistic to consider that between 2022 and 2031 development will only occur at Ebbsfleet, Canal Basin, Northfleet Embankment East and Grove Road.
- The document needs to be prepared using a partnership approach including stakeholders (Higham Parish Council, CPRE)
- The Addendum does not truly reflect the outcome of the consultation as Officers comments were retained on sites where there were no responses

Appendix C – Extracts Kent Housing Group

Better Homes: Older People's Housing Needs and Aspirations

<http://www.kenthousinggroup.org.uk/uploads/CopyofBetterHomesv4smaller%5B1%5D.pdf>

Extracts from page 10

- Housing strategies for older people to 2031 will therefore need to recognise that increasing proportions of the older population in future years are likely to own their home. This has a significant bearing on older peoples housing aspirations and their expectations if they move out of their existing home into specialist accommodation.
- Broadly, many home owners will seek to stay in their existing home for as long as they can, even if it is over-large and difficult to maintain. Housing, care, and health authorities need to consider the implications of infirm people living in their own home. Provision of suitable smaller accommodation for purchase could encourage some to down size and free up existing larger housing stock.
- If and when these home owners need more specialist provision, they are more likely than past generations to be in a position to buy property in targeted developments, but they will want their 'own front door'; and may have much higher expectations and ability to pay for quality and space than past generations, though that will not be true of all older people.
- Strategy and policy for housing older people needs to reflect this changing pattern of demand. The bulk of specialist provision for older people will be provided by the private sector, and the majority of their clients will be able to buy their property. This presents new challenges particularly in planning policy.
- However there will still be significant numbers of older people who are social housing tenants or private rented tenants, who may need specialist accommodation that mesh support, care and housing provision in different combinations. Public policy needs to be directed to how best to meet the housing and care needs of these "low income, limited capital" individuals and households.

Extract from page 18 = Proposals for Development in Rural Areas: Rural locations are attractive for older people's accommodation, not least because many older people live in rural areas, want to live close to where they lived previously and want to live in a rural setting. However, much of Kent is covered by environmental designation or is designated as Green Belt. Development proposals in rural locations are therefore controversial and authorities have concerns about how sustainable development proposals are in terms of access to public transport etc. Schemes have been refused on the basis that they are located in relatively isolated settings. However, this may mean that locally arising demand and need goes unmet. Greater clarity is required on how to assess locally arising demand and need; and what sort of criteria regarding sustainability should be applied to specialist accommodation provision for older people. For example schemes may provide their own transport to local facilities; and they may be important providers of employment in rural areas.

Extract from page 20 = 'older people' represent a wide range of consumers and lifestyle choices. Policy therefore needs to recognise choice and diversity. Planners need to

recognise that older people have the right to choose between institutional or independent units.

<http://www.kenthousinggroup.org.uk/uploads/WorkingPaper1-OlderPersonsAccommodationTrends%5B1%5D.pdf> - This working paper presents findings from a review of national literature and highlights key topics which are important to understand in assessing the accommodation needs of older persons.

<http://www.kenthousinggroup.org.uk/uploads/RuralProtocolFINAL2.pdf> A PROTOCOL FOR DELIVERING AFFORDABLE LOCAL NEEDS HOUSING IN RURAL KENT

- Pg.5 - Recent trends have shown that Kent is moving towards an ageing rural population, with more middle age and fewer young people (15-29s) than the general population. Younger age groups and families are under-represented in rural communities and are being replaced by inward migration amongst older groups. This has implications for the continued sustainability of local rural services and businesses, as well as for the communities themselves.
- Pg.5 - The availability of either affordable local needs housing or private rented accommodation within rural areas is relatively low. This means that there are few options for people living in the rural parts of the County to have their housing needs met locally. The result is that many of these people will move away from rural areas to places where housing is more affordable.
- Pg.6 - This creates a number of wider economic, social and environmental impacts, including lower paid workers not being able to live locally, young people being unable to set-up home close to their families and disproportionate numbers of older people living within rural communities.
- Pg.6 - Problems of delivery have also helped to prevent the provision of affordable local needs rural housing. A lack of suitable sites or landowners reluctant to release sites and often complex, intensive and costly planning and highways requirements for rural developments, combined with a dwindling public finance resource, are all common barriers to new housing provision.
- Pg.6 - In addition, local public opposition to new development can either block development completely or cause lengthy and costly delays to development.

Appendix D – Extracts from draft National Planning Policy Framework (our emphasis in bold)

Para 13 - **The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.** A positive planning system is essential because, without growth, a sustainable future cannot be achieved. **Planning must operate to encourage growth and not act as an impediment.** Therefore, **significant weight should be placed on the need to support economic growth through the planning system.**

Para 14 - At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. **Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible.**

Bullets under Para 19 –

- Decision-takers at every level should assume that the default answer to development proposals is “yes”, except where this would compromise the key sustainable development principles set out in this Framework
- planning policies and decisions should take into account local circumstances and market signals such as land prices, commercial rents and housing affordability. **Plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business community**

Para 73 - Investment in business should not be over-burdened by the combined requirements of planning policy expectations

Para 81 - Planning policies should support sustainable economic growth in rural areas by taking a positive approach to new development.

Bullets under Para 109 –

- **identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements.** The supply should include an **additional allowance of at least 20 per cent** to ensure choice and competition in the market for land
- not make allowance for windfall sites in the first 10 years of supply, or in the rolling five-year supply, unless they can provide compelling evidence of genuine local circumstances that prevent specific sites being identified

Paragraph 110 - The presumption in favour of sustainable development means that Local Plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Applications should be considered in accordance with the presumption. **Planning permission should be granted where relevant policies are out of date**, for example where a local authority

cannot demonstrate an up-to-date five-year supply of deliverable housing sites.

Paragraph 112 - In rural areas, **local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing.** Local planning authorities should in particular **consider whether allowing some market housing would facilitate the provision of significant additional affordable housing** to meet local needs. To promote sustainable development, housing in rural areas should not be located in places distant from local services.

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