

FAQs: Gravesham Local Plan Site Allocations and Development Management Policies Document (October 2020)

Please note that this document will be updated to reflect additional questions as needed. To assist with version control, the last revision date will be given

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The Development Plan

1. What is the Site Allocations and Development Management Policies Document?

The document consists of two parts:

- Part 1 Local Plan Core Strategy Partial Review and Site Allocations – looking at the scale of new development needed and land for future development
- Part 2 Draft Development Management Policies – detailed policies for dealing with issues that arise from planning applications

Once adopted the document will, together with the Local Plan Core Strategy and Kent Minerals and Waste Local Plan, form part of the Development Plan for Gravesham

2. What is the Local Plan Core Strategy? Why do we need one?

The Local Plan Core Strategy was adopted in September 2014, and sets out the broad principles of how Gravesham should develop to 2028. It sets out what and how much development will happen, where this will be located and when it will happen.

All local authorities are legally required by Government to prepare a Local Plan for their area and to keep it up to date. If it is not up to date, the Government will determine future development decisions with reference to the National Planning Policy Framework without regard to local people having a say on local policies.

3. What is a Local Plan Core Strategy partial review?

The Government requires local planning authorities to review their local plans every five years. A review of the Local Plan Core Strategy has identified that while the bulk of it is still relevant, a limited number of policies have now become out of date and the Council is required to update those policies as soon as possible. The remainder of the policies will remain unaltered.

4. Why do we have to have a plan for more development?

It has been accepted by Government that there is a national housing crisis. Equally it is recognised that the housing supply crisis is complex and has no single cause, but one important prerequisite for solving it, is to identify enough land for building..

At a national level, England lacks a strategic plan to identify the best sites for housing, jobs and key infrastructure and instead, national policy is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

Since 1995, policy is for the majority of building to take place on brownfield land, and indeed this is an important and necessary option. But in practice brownfield cannot supply enough land to meet projected housing needs.

Our development needs have increased from when the Core Strategy was adopted and the plan period has been extended from 2028 to 2036, as we have to identify land for development for a longer period (15 years). The Government requires a Local Plan to

aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole.

5 What are Development Management Policies and why are you including them?

Development Management Policies set out the local standards and criteria against which planning applications for the development and use of land and buildings will be assessed. We currently have some development management policies saved from the 1994 Gravesham Local Plan 1st Review. These need to be replaced or brought up to date and made consistent with the Core Strategy and the National Planning Policy Framework.

6 Is the Council proposing to alter the Green Belt boundaries via the development of this plan?

The Council has committed to undertake a strategic review of Green Belt boundaries. The study is being undertaken in two stages: a strategic review of Green Belt purposes which was published in 2018 and a more detailed site assessment of potential land which could be considered for review of the Green Belt boundaries which is being published as part of this consultation .

Stage 1 is strategic in nature, which is appropriate at this stage of the Local Plan development, and explores the performance of the Green Belt designation against NPPF criteria in isolation from other potential factors to be considered.

Stage 2 of the review considers detailed land parcels and boundaries against a range of other factors. For clarity, detailed Green Belt boundaries cannot and should not be identified until the level of development, likely densities, sustainable development considerations and land take is known and until other elements of the evidence base have been completed. It is at this detailed boundary stage that existing anomalies and boundary strength can be considered.

Soundness of the Plan

7 What is soundness and can Gravesham adopt an unsound Plan (for example one that does not make full provision for its housing needs)?

Plans are sound if they meet the area's objectively assessed needs; are justified by being appropriate, taking into account reasonable alternatives and based on proportionate evidence; are effective by being deliverable over the plan period and: are consistent with national policy. Legislation is very clear (section 23 of Planning and Compulsory Purchase Act 2004) that if a Planning Inspector recommends non-adoption (with or without major modifications) the Planning Authority cannot adopt a Plan.

The Consultation

8 What are Regulations 18 and 19?

Regulation 18 of the Town and Country (Local Planning) Regulations 2012, requires that various bodies and stakeholders be notified that the Council is preparing a plan. It invites them to comment about what the plan ought to contain. The local plan is currently at the Regulation 18 stage which we have undertaken in two parts. Part 1 in July 2018 and Part 2 in October and November 2020

Regulation 19, requires that before submitting a local plan to the Secretary of State, a copy of each of the proposed submission documents and a statement of the representations procedure must be made available for inspection at council offices and other locations and published on the Council's web site.

A copy of the representations procedure and details relating to the places and times where inspection of the documents can take place, must be sent to all consultation bodies who were invited to make representations under Regulation 18.

As a result of the Covid 19 pandemic, these regulations have been modified and details are set out below in response to the question "How do I take part in this consultation?"

9 Why are you consulting on these documents?

The Council in the Core Strategy undertook to look further at the development quantities needed and at Green Belt boundaries. Following an initial consultation in 2018, we have considered the representations received and gathered additional information on the amount of required development and where it could take place. Before progressing further, we need your thoughts on how to positively plan for the Borough's future needs. As part of its information gathering, the Council has asked land owners and developers to submit potential sites for development, which have been reviewed as part of the Strategic Land Availability Assessment (SLAA). The inclusion of a site in the SLAA does not imply any acceptance of it by the Council. Until a site has planning permission or forms part of an allocated site in the development plan, a site has no planning status.

10 How do I take part in this consultation?

You can take part in this consultation by visiting the Council's consultation website at:

<https://localplan.gravesham.gov.uk>

In accordance with the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, the documents will NOT be available for inspection at Gravesham Gateway, Gravesham Borough Council Offices, Civic Centre, Windmill Street, DA12 1AU.

Due to the current situation, we are discouraging people from coming to the Civic Centre, in the interests of trying to prevent the spread of Coronavirus (COVID-19).

If you wish to view the documents you can book a PC at www.kent.gov.uk/libs.

We would welcome your comments in writing on proposals set out in this consultation. We would ask that you respond using the Council's web site or if that is not possible, to use the response forms provided.

Please e mail: planning.consultation@gravesham.gov.uk or post to :

Planning Policy, Gravesham Borough Council, Civic Centre, Windmill Street, Gravesend, DA12 1AU.

If you would like to be added to our contact list for planning matters, please register your details at <https://localplan.gravesham.gov.uk>

11 How will my comments be considered?

We want as many people as possible to join in the debate about the future growth of Gravesham and we will listen to everyone who contributes to the consultation. All responses received, will be considered and used to shape the formal Stage 3 version of the Partial Review. The responses and a summary of the issues that are raised will be reported to Members and published on the Council's web site.

12. What happens next?

A Publication Draft version of the Local Plan will be made available for formal comments during 2021. Once received, these representations will be collated, together with the evidence base and other documentation and will form the revised Local Plan that will be submitted to the Planning Inspectorate for examination. The Plan will then be examined by an independent Planning Inspector who will report on whether the document meets with legal requirements and is sound. There will be an opportunity to make modifications to the Plan at this stage if they are deemed necessary. If the Plan is legally compliant and sound, the Council will then formally adopt it, and it will then become part of the statutory development plan

13 Do I have to give my personal information when making a comment through the consultation process?

As the plan develops it is a national requirement that comments are 'duly made' i.e. they are received in a written format with a name and address supplied. Comments made verbally or anonymously cannot be accepted. Once the consultation period ends, all comments will be made available for the public to see. Any personal details (apart from your name), will remain confidential. Comments or 'representations' will not be taken into consideration or published if they contain anything that is considered racist, discriminatory, defamatory or derogatory.

Please refer to the Privacy Notice available on the consultation web page.

14 Is it true that standard letters are not counted?

We understand that there are a range of myths around local plan consultations and representations that will and won't be acceptable. As representations will inform future decisions on how the borough will meet its development needs, we do need to be able to attribute the comments to addresses to reduce the risk that a few people are biasing the responses by the volume of response.

- **Petitions** – can be a useful way to highlight a particular viewpoint. The Council will require petitions to include names and addresses. By signing the petition, people are agreeing that we can log that they have commented. People may want to consider setting up an e-petition and the Council provides this facility via its website.

- **Standard letters** – can be helpful when a more detailed response is wanted that can be shared with like-minded individuals. These don't need to be personalised to count, rather we just need a name and valid address

15 I want to respond but have some questions first, how can I ask these?

We have produced this FAQs document which we will be keeping updated with new questions (there will be a version number attached).

Terminology

16 What is a Strategic Land Availability Assessment?

The Strategic Land Availability Assessment is an assessment of land to identify sites that are available or could become available within Gravesham up to 2036, which are suitable for housing, employment and other development.

17 What is the National Planning Policy Framework?

The National Planning Policy Framework (NPPF), sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their councils can produce their own distinctive local plans, which reflect the needs and priorities of their communities. The Framework must be taken into account in the preparation of local plans and is a material consideration in planning decisions.

18 How is National Planning Policy changing?

The Government recently published a White Paper for consultation entitled Planning for the Future, which proposes a fundamental change to the way planning will be carried out in this country. However, any resulting changes will be dependent upon changes in legislation and do not yet require local planning authorities to change the way that local plans are prepared,

19 What is Objectively Assessed Need?

The objectively assessed need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period. Objectively assessed housing needs are based on facts and unbiased evidence. Constraints such as the availability of land, historic underperformance, viability, infrastructure or environmental constraints cannot be applied to the overall assessment.

20 What is the Duty to Cooperate?

The duty to cooperate requires local authorities to work together on matters that span local authority boundaries. Such topical matters can include infrastructure provision such as highways, utilities and health but also includes matters such as housing, employment and retail needs. An issue of particular relevance at present is whether any of our neighbouring planning authorities, within our wider Housing Market Area, has the capacity to take some of this Borough's objectively assessed housing need. It is for this Council to show that these needs cannot be met within our Borough in the first instance.

Initial discussions have taken place with the Dartford and Medway councils to this end, but they first need to see the evidence of Gravesham's attempts to meet its own needs

and fully understand the implications of such an agreement for themselves before further discussions are progressed.

21 What is previously developed land?

Previously developed land, or brownfield sites, are areas of land which have had development on them in the past and have not been restored. They may or may not have been cleared of existing buildings. Such sites may have contamination, depending on previous uses, and may require new or upgraded utilities (roads, water, sewage etc.). As a result they can be very expensive to develop.

22 What is a Sustainability Appraisal?

A sustainability appraisal is an assessment of the environmental, economic and social impact of policies to ensure that all policies and proposals reflect sustainable development principles. An appraisal is being undertaken at each stage of the preparation of a local plan to inform policy development.

23 What are saved policies?

Policies in the Local Plan First Review, 1994, were due to expire in September, 2007. However, the Secretary of State issued a Direction enabling certain policies to be saved. This meant that they continued to be applied in the planning process. Some, but not all of these policies were superseded when the Core Strategy was adopted in 2014. The remaining saved policies have continued to form part of the statutory development plan but they, in turn, will be replaced when all the components of the local plan are adopted.

24 What is a stakeholder?

For the purposes of the consultation process stakeholders consist of everyone living, working, visiting and investing in the Borough, together with Parish Councils and commercial, environmental and other interest groups, who have made or may wish to make representations regarding the preparation and contents of one or all stages of the local plan.

25 What is a neighbourhood plan?

A neighbourhood plan is a plan prepared by a parish council or a neighbourhood forum for a designated neighbourhood area. Once adopted, it forms part of the statutory development plan for the Borough.

26 What is NOMIS?

NOMIS is a service provided by the Office for National Statistics to provide access to the most detailed and up-to-date UK labour market statistics from official sources.

27 What is a development corporation?

Development Corporations are organisations set up and funded by the Government and charged with the urban development of an area, outside the usual system of town and country planning. Its Members are appointed by the Government. The Ebbsfleet Development Corporation is developing a vision for the proposed Garden City and is funding a wide range of infrastructure provision. Although Gravesham Council remains the statutory plan making authority, planning applications within the Ebbsfleet Development Corporation' are dealt with by the Corporation.

Housing

28 What is a Housing Market Area?

A Housing Market Area is an area which reflects where people both live and work and which provides a variety of housing types with a common range of house prices. Gravesham's housing market area extends beyond its boundaries into the boroughs of Dartford and Medway

29 How does the council decide how many homes are needed?

The process we undertook in the early stages of plan preparation was to determine Gravesham's Objectively Assessed Need (OAN), which was included in a Strategic Housing Market Assessment (SHMA) document. The Council prepared this jointly with Medway as part of a broader Strategic Housing & Employment Needs Assessment for their respective areas. This assessment has not been updated to inform the current position, mainly due to the changes made by the Government to Planning Practice Guidance on housing and economic needs assessment. That Guidance now advises that unconstrained housing need must be calculated using the Government's standard method formula in the first instance. This is intended to identify the minimum number of homes that need to be planned for. The Government is clear that household growth must be calculated using the 2014-based household projections in order to meet its objective of significantly boosting the supply of homes. .

30 What is a Strategic Housing Market Assessment?

The Strategic Housing Market Assessment is an assessment of the housing market area, carried out with those adjoining authorities which are within the same market area, which identifies the scale and mix of housing, the range of tenures, the provision for different groups and the amount of affordable housing that the local population is likely to need over the plan period.

31 Instead of building new homes, can't we just bring empty properties back in to use?

Vacant properties are part of the property market. They include properties which reflect normal "churn" in that market (buying, selling, renting etc. of existing housing stock). They are private homes which are empty and unfurnished for short periods of time, generally less than 6 months, usually because they are being sold, repaired or re-let

The amount of newly arising housing need and the backlog of housing need, dwarfs the number of long-term empty properties in nearly all areas. In Gravesham, the number of long term vacancies in 2019 was only 204 dwellings.

The Council is aware of the number of vacancies in its publically owned housing stock and it has been making excellent progress in reducing the number of vacant properties in the borough in recent years, and will continue to work with partners to reduce that number in future..

32 Who will be moving into these houses?

The majority of houses will be for private sale and therefore for sale on the open market. The affordable housing will be allocated in line with national and local policies on housing allocations.

Development Strategy

33 Are you changing your development Strategy?

The Council's strategic objectives remain the same as in the Core Strategy with a focus on concentrating development on the brownfield land in the urban core of the Borough. At the same time, the increased housing requirement is greater than the remaining capacity that can be identified on brownfield land within the Borough. Consequently, the strategy is being reviewed.

34 Why is the supply of development sites in the urban area limited?

There is a finite amount of development opportunities within the Borough, with all of the major development sites identified within the existing Local Plan Core Strategy and/or existing land supply. The Council at present is continuing the Local Plan Core Strategy approach of protecting existing employment areas, open spaces, car parks and heritage assets which also restricts development opportunities in the urban area.

In addition, the Council has commissioned updated work on viability and this continues to show that high density development on brownfield sites, without significant public sector funding, is not financially viable. As a result, it is not practical to identify areas of the Borough for redevelopment (outside of the existing key sites and opportunity areas) when there is no reasonable expectation of such development occurring.

35 Why are sites with planning permission in the urban area failing to be developed and what can be done to achieve their development?

Sites with planning permission may not have come forward for various reasons:

- A brownfield site may be contaminated and costly and up-front remediation may be necessary;
- The site may have been bought at a higher a price than warranted by current market conditions;
- The cost of infrastructure requirements may affect the overall viability of the development;
- The developer may be prepared to wait for house prices to rise and for profit margins to increase before proceeding with development;
- The developer may have sought planning permission in the first place with the intention of selling it on when market conditions are right.

There are two avenues open to the Council to help in bringing sites forward. The first requires the costs of infrastructure to be borne by the developer. The NPPF requires local authorities to be flexible, where appropriate, in seeking such financial contributions where there is a risk of development being stalled. In common with most local authorities, the Council is reluctant to allow development to proceed without the necessary supporting infrastructure being provided.

The second avenue is the use of compulsory purchase powers. However, this is a costly and time consuming process and rarely used at a time of spending cuts in the public sector. The Government being aware of the problem of "land banking" by developers commissioned Sir Oliver Letwin to investigate the gap between the amount of land allocated or with planning permission and the rate at which that land comes forward for

development. His final report, in 2018, concentrated on large sites of 1500 or more houses and concluded that such sites failed to provide a variety of housing and consequently the market could not rapidly absorb them. The Government has now proposed, in its White Paper, Planning for the Future, that national policy be amended to make it clear that masterplans and design codes should seek to include a greater variety of development types by different builders on large sites to enable more phases of development to come forward at the same time. Unfortunately, this does not address the problems of delay on smaller sites although the Government has stated that it would explore other options in due course.

It should be noted that the Council is retaining sites with planning permission in its housing supply figures and additional sites are not being sought to replace them.

36 Won't allocating greenfield sites, currently in the Green Belt, stop developers from bringing forward brownfield sites?

This issue has been debated at length at a parliamentary level for many years. In 2016, MPs on the Communities and Local Government Select Committee said that:

"We agree that the lower viability and higher costs of developing brownfield sites may be a deterrent for some developers, and are not persuaded that this barrier will be overcome by the proposals in the consultation and in the Housing and Planning Bill. We have particular concerns about the risk that developers will delay developing brownfield sites because local authorities will be required to release more profitable greenfield sites if insufficient housing is delivered to meet local needs. In its response to this report, the Government should set out how its proposals will overcome the potential cost barriers to the development of brownfield sites, and the steps it will take to encourage the development of such sites in order to meet local housing needs."

The issue remains unresolved.

Green Belt

37 Isn't the Green Belt an environmental designation?

Despite the name, Green Belt is not an environmental designation — in fact the minister responsible for its expansion in the 1950s, said Green Belt land did not have to be green or even particularly attractive, as its purpose was to stop the sprawl of urban development. However, government guidance suggests that after establishing a Green Belt, the local authority might want to improve public access, provide recreation opportunities or improve the appearance or quality of the land — but actual use or enjoyment of the Green Belt is clearly seen as an incidental benefit of the policy.

In the post-war period there was a two-pronged approach to directing development in South East England: the Metropolitan Green Belt (MGB) constrained the supply of land, and at the same time New Towns were created to house people dispersed from larger cities including London. This link between state planned constraint and development (and the cross regional approach), although never perfectly realised, has long since been broken.

38 Why are the Green Belt boundaries being reviewed?

The only way that the Green Belt's boundaries can be reviewed by a local authority is through a Local Plan Review such as currently being conducted. The Council committed to undertake a Strategic Green Belt Review as part of the independent examination of the Local Plan Core Strategy in 2014.

39 Is greenfield and/or Green Belt land going to be built on to meet housing need?

When the existing development areas, brownfield sites and regeneration sites are taken into account, there is a shortfall of land to accommodate about 3,000 dwellings up to 2036.. With only a limited supply of sites available within the urban area and settlements inset from the Green Belt, the Council has to investigate whether some development could be accommodated on greenfield and Green Belt land to make up the shortfall. It should be noted that major development sites within the urban area, such as land at Coldharbour Road, Ebbsfleet (Gravesham), Northfleet Embankment, Canal Basin, Heritage Quarter and North East Gravesend, are all factored into our existing supply.

40 What is 'not inappropriate' development in the Green Belt?

National policy is that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". National policy then lists specific categories of development which are not inappropriate subject to certain additional caveats. These include extensions, replacement buildings, minor infilling in villages and several other types of development.

41 Why are you considering building on Green Belt land when national planning policies protect the Green Belt?

The NPPF allows for development to take place in the Green Belt in two ways. As explained in the question above, certain forms of development are not inappropriate in the Green Belt. National policy also allows development to be approved except in 'very special circumstances'. This is a challenge case to make as 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In both cases no changes are made to Green Belt boundaries and the sites remain in the Green Belt.

National policy is that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of local plans. Whilst there is not a formal definition or standard set of assessment criteria to demonstrate exceptional circumstances, there is an increasing amount of case law as local planning authorities justify why they have determined that exceptional circumstances exist for them to review the boundaries of the Green Belt

If the boundary was amended to exclude land from the Green Belt, that land would no longer be covered by Green Belt policies although its development will be subject to other local and national planning policies. This would not be classed as Green Belt development.

If we are unable to demonstrate the provision of enough deliverable sites for housing in accordance with national planning policy, it is unlikely that the Inspector will recommend the Site Allocations and Development Management document for adoption. This could lead to ad-hoc decisions being made by third parties and development in the Green Belt

being approved on appeal with less suitable sites being brought forward for development.

Viability

42 What is Viability Testing?

The NPPF requires careful attention to be paid to viability and costs in plan making to ensure that planned development can be delivered. The intention, taking costs such as infrastructure, land acquisition and construction into account is to enable the provision of competitive returns to a willing land owner and willing developer to allow development to take place. Consequently, Gravesham Borough Council and Medway Council have jointly commissioned a viability Assessment of their respective local plans.

43 How do you know that your viability work is right?

The viability work has been undertaken by external experts and whilst it is based on assumptions, they have sought to use local evidence to support their work. As such the document is based on a scenario and does not factor in increases or decreases to local values and costs. The outcomes of this work have been presented to professional stakeholders for their input and should local market conditions significantly change it is possible for this work to be updated. However given the fundamentals of the housing, employment and commercial markets at this stage significant change is not expected in the short to medium term.

Site Appraisal

44 How do you choose which bits of land are going to be built on?

There are a number of elements to be taken into account when considering which sites are going to be developed. The Council has put out a call for sites, asking land owners and developers which sites they would like to develop. These, together with other sites identified by the Council have been assessed for their suitability for housing and other uses in a Strategic Land Availability Assessment. In 2018, the Council published a consultation document which included a number of alternative development options. When it has decided which option to pursue, it will then be in a position to identify which sites in the SLAA could enable that option to be fulfilled and consequently be carried forward as allocations for development in the Local Plan. As part of this process, National and local planning policies, constraints such as Green Belt and Areas of Outstanding Natural Beauty, flooding, infrastructure availability and other factors will have been taken into consideration.

Infrastructure

45 What are you going to do about making sure there are enough doctors surgeries, schools and other facilities to cope with all the people living in the new homes?

We recognise that the provision of enough facilities is a concern. We will consult the organisations which are responsible for the provision of facilities to get their views on the objectively assessed needs identified and the sites included within the SLAA. This includes the Primary Care Trust, which is responsible for providing enough health facilities, and Kent County Council, which is responsible for providing schools and libraries.

46 What about traffic?

For a number of years, the Council has been working with Kent County Council, Dartford Borough Council, Highways England and developers, and more recently the Ebbsfleet Development Corporation, on a package of strategic transport mitigation to support growth including congestion-reduction measures.

We understand people have very strong concerns about how any new strategic transport infrastructure can be delivered. We also understand that some people feel that the only way to stop further congestion is to prevent development but such a blanket approach to stopping future development is not in line with Government policy. Instead the Council understands that traffic congestion is caused by multiple causes, for example high car ownership and high levels of vehicle movements and commuting are contributors to traffic congestion on main roads across Gravesham at peak times. Different measures will have different effects – some are temporary as, for example, people adapt their lifestyles to prevailing road conditions. Equally we do not know how technology can help in the future and will be mindful of not overestimating potential beneficial impacts.

Biodiversity

47 Is it a requirement that the Council commissions wildlife studies for sites?

It is not a specific requirement that wildlife studies are carried out for the current Site Allocations and Development Management document. However, the Strategic Land Availability Assessment (draft) does discount sites where development would have a negative impact on the following internationally and nationally important wildlife sites:

- Sites of Special Scientific Interest
- Special Areas of Conservation
- Special Protection Areas
- Ramsar sites

In other cases, the Strategic Land Availability Assessment identifies sites where development would have an impact upon flora and/or fauna and other locally valued areas, including Local Wildlife Sites and other sites that provide important habitats for wildlife.

A number of species are protected by law. National planning policy requires these species to be protected from the adverse effects of development through planning conditions or obligations, where appropriate. It states that planning permission should be refused where the harm to these species or their habitats would result unless the need for, and benefits of, the development clearly outweigh that harm.

Natural England and local wildlife interest groups, e.g. Kent Wildlife Trust, will be consulted and their comments will be considered, responded to and made available for the public to see.

Employment

48 What provision is being made for employment?

Housing numbers are not the only consideration – although they are a very important one. The local plan also has to take account of development land for industrial, retail and

other commercial use. In short, this means jobs. The ability to provide sites for employment has a direct effect on housing need and housing demand and this has been taken into account whilst identifying the need for housing. The Borough cannot only depend on the scale of job creation from the development of Ebbsfleet and the London Resort when and if they eventually emerge, and there is a need to improve the Borough's local economy by promoting start-ups and providing follow-on space for businesses to expand into.

Town Centre

49 What is proposed for Gravesend town centre?

We recognise the important role of Gravesend Town Centre to the Borough. The Council is maintaining its vision and policy for the town centre and the strategy envisages that the key regeneration project sites in the Heritage Quarter and the Transport Quarter will be developed

The eastern Heritage Quarter site, known as the Charter Development, received planning permission for 242 build to rent residential units in July 2020. Proposals for the western Transport Quarter site, known as St. Georges Phase 2, are expected to include a new Civic Square, offices, a theatre/cinema, a hotel, retail space, commercial units, a new St Georges Church Hall, an extension to St Georges Car Park and 155 residential units. A new Civic Centre will be built adjacent to the theatre/cinema. In addition, the Council's Economic Development team is working on proposals to enhance the town centre's night time economy and leisure offering.

Ebbsfleet

50 Given the development of Ebbsfleet, why is further development necessary?

Only about 15% of Ebbsfleet falls within the Gravesham area and development on this land has already been taken into account in Gravesham's existing housing land supply calculations. The remainder falls entirely within the Borough of Dartford and will contribute towards meeting Dartford's housing needs.

51 Should priority be given to the development of the quarries at Ebbsfleet before further development takes place?

During the development of the Gravesham Core Strategy, a number of representors highlighted previously-developed land where development should take place before sites were removed from the Green Belt. Most of these sites are in Dartford in the area covered by the Ebbsfleet Development Corporation.

The quarries fall entirely within Dartford and whilst Gravesham's housing market area extends into Dartford they could only contribute towards meeting Gravesham's housing needs if Dartford Borough Council agreed to meet some of Gravesham's need through the Duty to Cooperate. There is no compulsion to do so. In the absence of such an agreement, Gravesham is required to continue to plan to meet its own housing needs.

Gypsies and Travellers

52 What is happening about Gypsies and Travellers?

The Council is required by Government to consider the accommodation needs of groups with specific housing requirements which includes the needs of Gypsies and Travellers, whether they meet the planning definition set out in the Planning Policy for Traveller sites or not.

A Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in 2017. It identifies an increased need in the Borough for traveller pitches, above that identified in the 2013 Accommodation Assessment for those Travellers who meet the planning definition set out in the Planning Policy for Traveller Sites (2015). The outcome of this assessment is set out in the Consultation Document.

We will be updating this assessment and identifying sites to meet the identified needs for accommodation for this group prior to the next public consultation at Regulation 19.

Culverstone

53 Will the Culverstone Valley Area be developed?

Previous consultations on the potential development of the Culverstone Valley Area (CVA) have generated highly polarised views. Some people want the Culverstone Valley Area to remain in the Green Belt and with new development minimised to that allowed under existing Green Belt policy. Equally some people want development to be allowed on all of the plots. Therefore this consultation needs to include this location as an option.