we need your views

LOCAL PLAN REVIEW

Updating Gravesham’s priorities for the next decade

Delivering for the Community
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Foreword

We are inviting everyone to have their say on the review of the Local Plan. The plan is not only a legal requirement but also gives clarity for residents, developers and planners in decision-making for the next decade. It is a blueprint which determines what can be built and where it may be permitted.

I know that there has been a lot of background noise on social media and in the local press claiming that the Green Belt is at risk. That doesn’t have to be the case if we can find land elsewhere, but the council has been instructed to look at all possibilities in order to respond to the Government’s targets for housing needs. The council has to show it has considered all the options. If we don’t, the entire Green Belt would be at risk.

Without a Local Plan, development decisions will almost certainly be taken away from local people and determined by Government Inspectors who will have an automatic presumption to approve applications. The best way to protect the Green Belt is to produce a thorough masterplan which identifies uses for land in the borough for housing, employment, leisure, farming and commerce.

The council is required to take a number of factors into account and one of those factors is ensuring an adequate supply of housing land. What is “adequate” is defined by the Government and, at this stage, it includes 8,035 homes. As at 1 April 2017 there were 6,000 homes with planning permission or assumed to come forward, leaving a shortfall of 1,800. Because of some of the uncertainties we have to assume the shortfall is 2,000.

Weighed against any presumption not to expand existing settlements or to change the character of our villages and towns is the aspiration of elderly residents of the borough to stay in their local communities and close to their friends and families, but in housing that meets their needs and provides for the support services that they require. At the same time there is an acute need to enable the borough’s younger generations to get onto or move up the housing ladder and prosper.

If you are opposed to development, whether it be higher density development in our villages and towns or the expansion of our towns and villages via developing on land currently designated as Green Belt, please respond to this consultation with your views and thoughts on where and how we can meet the development needs of current and future generations.

I urge you all to take part in the consultation and help us get the best result for Gravesham.

Councillor David Turner
Leader of the Executive
What is the Local Plan?

All local planning authorities must produce, adopt and maintain a Local Plan. Gravesham’s Local Plan guides the growth needed in the borough while protecting communities from harm. The Local Plan provides certainty to residents, businesses and landowners regarding how much development is needed, where it will take place, what infrastructure and services are needed to support development and what measures need to be taken to protect the local environment, heritage and other important assets.

Gravesham’s Local Plan affects everyone who lives and works in the borough, so we want everyone to take part in this consultation in order that all views can be taken into account.

What is this consultation about?

The council adopted the current Core Strategy, which sets out our strategic policies, in September 2014. The Government requires Local Planning Authorities to review their Local Plans every five years to ensure they remain valid and up to date. If a Local Plan becomes out of date, the Government can step in and take control of the local planning process. Much of the current Local Plan remains up-to-date and relevant, however we have identified three key areas of the Local Plan Core Strategy that need to be reviewed. These are:

- How much development is needed
- Where this development should be located, and
- If and how the Green Belt or any other policy constraints need to be changed to accommodate development.

We have also prepared a set of Development Management policies to provide more detailed guidance for submitting and determining planning applications. These conform with the existing Core Strategy, Government guidance and will replace some existing policies that date back to 1994.

The consultation material on the Development Management policies is available at www.gravesham.gov.uk/yoursay, along with all the technical information supporting this document.

How long is the consultation period and do I have to comment again?

This new consultation begins on 25 April 2018 and ends on 20 June 2018. This eight week period reflects Government regulations, and the council’s ‘Statement of Community Involvement’ which is available at www.gravesham.gov.uk/statement. It also allows for two Bank Holidays and half term in that period.

Comments made previously cannot be taken into account again, as the Local Plan review is a new process and we have to consult local communities and stakeholders afresh.

A series of drop in sessions, stretching into the evening, at venues across the borough will be held, so you can come and discuss the consultation with us. Details will be posted on the web site, along with a series of Frequently Asked Questions. Please visit www.gravesham.gov.uk/yoursay for more information.
What did we do?

Having considered the technical evidence, local views and the views of other stakeholders, like developers, land owners and businesses, we submitted the Core Strategy to the Planning Inspectorate, a Government body, for examination in May 2013. The submission version of the Core Strategy did not propose development on:

- Green Belt land
- Greenfield land (except for some permitted sites in the urban area)
- Major open spaces

However, during the Local Plan Core Strategy examination the independently appointed Inspector from the Planning Inspectorate warned that he would find the plan unsound because it did not include enough new homes required by Government policy. He gave the council four options;

- Declaring the plan unsound
- Delay the plan for further work
- Make modifications, or
- Withdraw the plan.

A withdrawal of the plan or a declaration of unsoundness would have led to years of uncertainty and planning applications decided by appeal. It could have meant the potential development of greenfield and Green Belt sites in a random, uncoordinated way, without a proper framework.

For these reasons, the council told the Inspector that we wanted him to recommend modifications needed to make the Core Strategy sound. The main modifications proposed were:

- An increase in the number of new homes from 4,600 to 6,170 – this change was a result of the publication of revised migration figures by central government
- The inclusion of land north of Coldharbour Road as part of a key site to provide around 550 new homes
- A commitment to undertake a Strategic Housing Market Assessment to identify the up-to-date need for housing to 2028 and an updated Strategic Land Availability Assessment to set out how this housing need can be delivered
- Reference to the need for a strategic Green Belt boundary review to identify more land for development up to 2028 – this change was needed because our evidence showed that we could not provide all of the new development needed in the existing urban area and rural settlements inset from the Green Belt.

We made those changes to the Local Plan and, after more consultation and examination in late 2013 and early 2014, the Core Strategy was adopted on 30 September 2014.

That Core Strategy and the Planning Inspector’s report can be viewed at: www.gravesham.gov.uk/localplan
What about comments made in 2014?
The council undertook some consultations before adopting the Core Strategy of the Local Plan in September 2014. People told us:

- Housing and employment growth should meet local needs only
- Gravesend needs more affordable housing
- Brownfield sites should be regenerated and development opportunities in the urban area maximised
- Retail and leisure development should be directed towards Gravesend Town Centre
- Local environment and heritage assets should be protected
- Agricultural land should be protected to ensure sustainable food protection
- The Green Belt should be preserved in its current form
- Local congestion and on-street parking is an existing issue which will only be worsened by more development
- Local services like GPs’ surgeries, schools and Darent Valley Hospital are overused.

What have we done since 2014?
Since 2014 we have commissioned and undertaken a number of technical studies. Key messages arising from these studies are:

- The need for new housing has risen
- The existing Green Belt is performing its objectives
- The landscape in the rural area is sensitive to additional development
- There are major environmental constraints on much of the area
- Supply of employment land that the market wants to develop is limited
- Development of brownfield sites is constrained by development costs (provision of infrastructure, removing contamination etc.)
- A Register of Brownfield sites has been published, including such sites as:
  - Canal Basin
  - Northfleet Embankment East
  - Land at former Northfleet Cement Works
  - The Heritage Quarter
What is the process for updating the Local Plan?

Evidence Gathering and Public Participation

We collate and prepare relevant evidence on key issues as well as the environmental impacts and benefits. We then consult on the scope of the plan and issues, this is your initial opportunity to make us aware of any relevant views and evidence you would like us to take into consideration.

This stage is known as Issues and Options and we have split this into two consultations. With this initial consultation taking place in spring 2018 and a further consultation taking place in mid 2019, to further refine the options for addressing the issues.

Pre-Submission Publication Stage

Having taken into consideration consultation responses from the public participation stage, further technical work and the findings of the environmental work we will publish a ‘submission document’ for consultation. This is a more formal consultation and lasts for six weeks and is accompanied by a Sustainability Appraisal and Strategic Environmental Assessment reports. This is the last opportunity to make comments on the plan before it is submitted for examination.

The purpose of this stage is to enable people to make comments that they want to be taken into account at the examination stage.

Once this consultation is complete, we will review the responses received and carry out an additional consultation if the comments necessitate significant changes to the ‘submission document’.

Submission of Document and Independent Examination

The final draft submission documents along with a summary of the main issues raised in the representations on the pre submission document will be submitted to the Planning Inspectorate. The Planning Inspectorate, will appoint an independent Inspector to examine whether the document preparation and consultation procedures meet the requirements of Government as set out in relevant Acts of Parliament and Lguidance. This includes assessing the final draft documents including the Sustainability Appraisal.

At this stage it is for the Inspector to decide how the examination will take place and who will be invited to take part in the examination.

Report and Adoption

If the Inspector recommends adoption, having found that the document satisfies legal requirements and is sound, the Council will seek to adopt the revised parts of the Local Plan as soon as possible.
What evidence has been gathered so far?

Strategic Housing Market Assessment
- The borough’s population has continued to grow. The objectively assessed need for homes now concludes that 7,905 are required, an increase on the original Local Plan Core Strategy
- Increasing the number of homes is one way to address local housing affordability issues
- Building homes for young people, to address concealed households, and homes for the elderly to enable them to downsize would free up family sized homes

Employment Land Study
- Gravesham has the smallest economy in Kent and there is a lack of local jobs
- There is a concern over loss of employment sites to housing
- Lack of potential employment land which is not part of complex sites or well related to the highway network
- Potential impact of London Resort needs further work, once the project is refined

Retail Needs Study
- This is a dynamic sector with a significant shift occurring to online retailing and a loss of major retail stores
- The rise of the smaller convenience stores in food retailing
- Larger regional centres expanding at the expense of small centres like Gravesend
- Greater emphasis on diversification of uses in the Town Centre
- Marginal drop in floorspace requirements

Strategic Land Availability Assessment
- Assesses sites submitted to the Council by landowners and developers for their suitability for development
- Publishing them implies no commitment by the Council to accept them
- Sites for some 7,900 homes submitted in the rural area
- Lower Thames Crossing Corridor Route impacts on some of these sites
- Sites will be examined in more detail at the next stage
Viability
- Developers will not develop sites unless they can make a reasonable profit
- Brownfield sites frequently have high costs for the removal of contamination or the provision of services
- Greenfield sites may have problems with infrastructure costs
- Land values in Gravesham are low compared with South East generally
- Flats cost more than houses to develop and especially on complex urban sites may not be viable

Green Belt Assessment
- Stage 1 of an overall Green Belt Review
- In broad terms the Green Belt in Gravesham is performing the five functions set out in national guidance
- A key function is maintaining separation between settlements
- Major strategic function is separating Gravesend from Medway Towns

Landscape Study
- Large part of the rural area is an Area of Outstanding Natural Beauty
- Elsewhere in the rural area much of the landscape is of high quality
- Impact of development on landscape varies between locations
What about the environmental impacts?

A key aspect of the Planning Process is to promote sustainable development, whilst preparing the Local Plan the Council is required to assess the issues and options identified against a range of environmental, social and economic indicators. This assists in identifying the likely significant effects of what the Council is considering and proposing and advises on ways in which potential adverse effects could be avoided, reduced or mitigated and how any positive effects could be maximised. This process also incorporates the requirements for the European Directive on Strategic Environmental Assessment (SEA), as well as considering the issue of equality and diversity.

How much development is needed between 2011-2028?

Based on the technical guidance from the government which requires future development needs to be assessed, the studies state that the Objectively Assessed Need in the borough is for:

- 2,290 jobs, although the Core Strategy target of 4,840 would remain
- 22,500 square metres retail
- 7,905 dwellings - which the government methodology now advises should be 8,035 dwellings.

It should be noted that the Government requirements mean that these figures will need to be reviewed again in late 2018, once new sub-national population and household projections are released by the Office for National Statistics.

Can the development needed be lowered and can local communities determine their own housing growth?

Current government regulations and guidance does not allow for this. The approach that Government requires the Council to follow is to first set out how much unconstrained development is needed in the borough (objectively assessed need) and then to review whether all of this development can be accommodated within the borough (current unconstrained land supply). If this development cannot be accommodated, the Government requires policies such as the Green Belt to be reviewed prior to the borough’s Local Plan development requirements being lowered below the Objectively Assessed Needs for development.

How much development can be accommodated at present?

The current housing land supply position as at 1st April 2017 is shown in the table overleaf. This shows that with the need figure of 7,905 dwellings there is, on the current assumptions made, a shortfall of around 1,800 dwellings. This number comprises the identified shortfall (1,300 dwellings) and assumed small and large scale windfalls (500 dwellings). However, this is a dynamic position and is dependent on planning permissions being implemented by developers and development sites in the borough coming forward at pace especially within the Ebbsfleet Development Corporation area. To provide for a certain level of flexibility the shortfall figure is rounded to 2,000 dwellings and will be refined as the Plan develops, although uncertainties will remain.
Can local infrastructure support the additional development needed?

New development, wherever it is, needs infrastructure to support it, some of which is site specific and some wider. This includes water supply, waste water treatment capacity, electricity, gas, education, health services, social services, leisure provision and transport. Taking transport as an example, this is about how a site might be connected to the local highway network and be served by public transport, but also how it relates to the wider transport network. In Gravesham the impact of additional traffic on the junctions onto the A2 is a key consideration. Highways England has proposals for improving the Bean and Ebbsfleet junctions to serve the large scale development in the Ebbsfleet area.

Many of these facilities are already under pressure from population growth both in Gravesham but also across the wider area. New development is expected to contribute towards the support infrastructure it needs. The Local Plan review process will need to look in detail at this in the future to establish, with the various utilities and service providers, what is needed and how it can be provided physically and financially. This work is ongoing and will be informed by responses received in this consultation and ongoing work with infrastructure and service providers.

<table>
<thead>
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<th>As at 1st April 2017</th>
<th>Dwellings</th>
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<tr>
<td>Completions since 2011</td>
<td>1,300</td>
</tr>
<tr>
<td>Permitted and implemented:</td>
<td>2,600</td>
</tr>
<tr>
<td>that is sites including those permitted subject to planning obligations being agreed</td>
<td></td>
</tr>
<tr>
<td>Allocated:</td>
<td>1,500</td>
</tr>
<tr>
<td>that is Key Sites from the Core Strategy that do not benefit from a permission or a resolution to permit subject to planning obligations being agreed</td>
<td></td>
</tr>
<tr>
<td>Supply anticipated from sites in the urban area and inset rural villages</td>
<td>600</td>
</tr>
<tr>
<td>Total identified supply</td>
<td>6,000</td>
</tr>
<tr>
<td>Assumed small and large scale windfalls</td>
<td>500</td>
</tr>
<tr>
<td>Shortfall</td>
<td>1,300</td>
</tr>
<tr>
<td>Total shortfall</td>
<td>1,800</td>
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Housing land supply at 1st April 2017 - figures (rounded to the nearest 100 Reflects 7,905 need for homes not the Government’s 8,035
Options for accommodating remaining development?

We are not proposing to make changes to the strategic direction of the adopted Core Strategy except in Option 1. The focus of the plan is to accommodate development within the urban area and settlements inset from the Green Belt in the rural area. With greater emphasis placed on regeneration of brownfield sites over development of Greenfield sites.

However at present, the evidence shows that all of the employment and residential development needed to 2028 cannot be accommodated within the urban area and settlements inset from the Green Belt in the rural area. Therefore, we are required by Government regulations to consider alternatives, including whether the Green Belt boundary should be adjusted to allow for the borough’s development needs to be met within its own boundary.

The Core Strategy already contains a settlement hierarchy based on service provision and this forms the logical basis for considering broad locations for further investigation. The settlement hierarchy is shown in the plan.

Since the adoption of the Core Strategy, the settlement hierarchy has been reviewed with fresh survey evidence and found to be robust. It therefore forms a reliable basis for going forward. It should be pointed out that in the medium to long term the provision of services in both the urban and rural areas is changing, partially in response to the manner in which we consume services and partly due to financial decisions taken by the providers.

For example, bus service provision cannot be taken as fixed, as it results from the commercial decisions of the bus operators and the services/routes the County Council subsidises.

The Green Belt exists to separate settlements at both local and strategic levels and is not an environmental policy. Whilst the Council has not yet carried out a full Green Belt appraisal, which will be required if any releases are proposed, we have assembled technical evidence. This looks at broad locations in the form of whether parcels of land are performing one of the five Green Belt functions, as well as the overall constraints, policy and otherwise. A landscape analysis has also been carried out.

The map on the next page shows that a significant part of the rural area is not suitable for large scale development as it is covered by major environmental constraints such as national and international nature conservation, landscape and flooding. This leaves an arc running from Culverstone Green up the A227 and around to Higham as a primary area of search.
The following options, on which views are being sought, are based on those originally set out in a report in 2014 and updated to reflect the new technical evidence since then. These use the settlement hierarchy from the Core Strategy.

Six distinct options have been identified:

- Settlement Intensification
- Urban Expansion
- Expansion of 2nd tier settlements
- Expansion of 2nd, 3rd and 4th tier settlements
- Creation of a single new settlement through the merger of existing settlements
- Creation of a free standing new settlement.

Each option is capable of modification, and some examples of possible changes are set out in the text. It is possible different options / modifications could emerge from the consultation process and further technical work.

Option 1 goes a stage further in suggesting that existing policy should be amended to allow development at higher densities, with less parking provision and the loss of existing open space and employment land.

Higher density development does not mean high rise. Core Strategy policy makes clear that all new housing should be at a density consistent with achieving good design and not compromising the distinctive character of the area where it is. This applies to other forms of development such as employment.

Options 2-6 have a number of factors in common to all of them, including:

- Maximisation of development in the urban area
- Release of land from the Green Belt for development
- Avoidance of areas liable to flooding
- Avoidance of specially designated areas for landscape and nature conservation
- Encroachment into the countryside
- Impact on the highway network
- Impact on public services.

Rural Area with NPPF Policies Restricting Development Applied Excluding Green Belt

- Primary area of search
- Rural area covered by major constraints e.g. nature conservation, landscape and flooding
- Rural Settlements inset from Green Belt
- Urban Area
Option 1
Settlement Intensification

- Generated in response to the Government’s proposed changes to the National Planning Policy Framework and the approach set out in the draft London Plan
- Would require the following existing Core Strategy policies to be relaxed / revisited:
  - Open and amenity space protection
  - Amenity standards
  - Parking standards
  - Protection for existing and allocated employment sites
  - Contributions to infrastructure provision and affordable housing
  - Density and design policies
- Compatible with the first priority of concentrating development in the urban area
- Does not consider the expansion of any rural settlement beyond their current boundaries
- Unlikely to be sufficient on its own with difficulties in identifying enough sites
- The identification of a larger number of smaller sites could facilitate the speed of delivery
- Would be close to existing public transport and other services and facilities
- More pressure would be placed on existing infrastructure e.g. roads, schools, utilities etc.
- Higher levels of congestion and on-street parking
- Need for higher density development close to public transport facilities in both urban and rural settlements and this could include taller buildings in some locations
- Potential harm to character of existing urban and inset rural settlements
- Loss of some amenity space with potential impacts on air quality, climate change resilience and heath
- Meet demand for smaller homes
- Over supplying small homes may not meet wider housing needs
- Loss of local employment / businesses could increase out-commuting.
Option 2
Urban Expansion

- The expansion of Gravesend to the east and/or the expansion of Strood to the west
- Compatible with the first priority of concentrating development in the urban area
- Represents planned, limited extension of the urban areas rather than an unrestricted sprawl
- Reduces the width of one of the narrowest parts of the whole of the Metropolitan Green Belt
- Does not require the expansion of any rural settlement
- Opportunity to include fresh land for employment to meet a range of business requirements
- Would not meet any special housing, employment or social needs of the rural settlements at those settlements
- Would be relatively close to existing public transport and other services and facilities
- The overall character of the urban area would not be adversely affected and the size of the sites would enable the provision of landscaping to soften localised impact on the urban setting
- The urban location could offer the opportunity for higher density development
- Clearly defined Green Belt boundaries would be formed by the Wainscott Northern By-pass (A289) and potentially the Lower Thames Crossing
- The amount of land which could come forward to the east of Gravesend would be limited due to the close proximity of the LTC to the urban area
- Development could be delayed due to timetabling and construction of the LTC
- It is noted that the Strood option could be enlarged if Medway Council were to release further Green Belt land within its area
- Medway Council is not currently proposing to release any Green Belt land in this area.
Option 3
Expansion of 2nd Tier Settlements

- The expansion of Istead Rise, Hook Green Meopham and Higham or any one or two of them
- Avoids urban expansion and its consequential narrowing of the gap between the urban areas but the expansion of Higham would impact on openness within that gap
- Does not require the expansion of the other rural settlements
- Opportunity to contribute to the vitality of the rural economy by providing some land for employment
- Opportunity to provide for local affordable housing and other special housing needs at some of the rural settlements
- Concentrates development at the three largest rural settlements with the largest number and range of services and facilities, thus helping to maintain them
- Well served by regular rail service to London and the Medway towns. Less frequent bus service link to Gravesend and Sevenoaks
- The larger settlements could be more capable of absorbing development without detriment to their character and with the possibility of landscape schemes to soften the impact on their settings
- Limited higher density development close to public transport facilities may be achievable
- Currently we have not identified any specific sites
- If large sites are identified, development could be slower than on small sites.
Option 4

Expansion of 2nd, 3rd and 4th Tier Settlements

- This option could be modified by including fewer settlements
- Avoids urban expansion and its consequential narrowing of the gap between the urban areas but expansion of Higham and Shorne would impact on openness within the gap
- Some potential for meeting local affordable housing and other special housing needs at the rural settlements
- Could provide small scale opportunities for non-residential uses and therefore contribute to the viability of the rural economy but it would depend on the scale of development at any particular settlement
- The 3rd and 4th tier settlements generally have fewer existing services and facilities to support new development and are more remote from the urban areas although some have access to the services in the 2nd tier settlements
- The scale of development is unlikely to be sufficient to attract new services and facilities in the smaller settlements
- Some settlements have poor public transport services and an increase in car reliance could result from new development
- Smaller settlements may have difficulty in absorbing new development without having an impact on their individual character
- Due to the size of the smaller settlements, the opportunities for higher density development will be limited
- Currently we have not identified any specific sites
- The allocation of a larger number of smaller sites could facilitate the speed of delivery.
Option 5
Creation of a Single New Settlement Through the Merger of Existing Settlements

- There are three possible locations at Higham/Lower Higham, Meopham and Culverstone/Vigo for the merging of existing settlements. The Meopham option, which consists of Hook Green Meopham/Sole Street and Meopham Green, could be modified by merging only two, instead of three settlements: Hook Green Meopham and Sole Street or Hook Green Meopham and Meopham Green.
- Avoids urban expansion and its consequential narrowing of the gap between the urban areas but an expansion of Higham/Lower Higham would impact on openness within the gap.
- Opportunities to contribute to the viability of the rural economy by identifying land for employment at a scale which could be attractive to a wide range of employment uses.
- Opportunities to provide for affordable and other rural special housing needs but only in the location chosen for the merged settlement.
- Could concentrate development at either Meopham or Higham which are second tier settlements with the largest number and variety of services and facilities of the three locations.
- Both Culverstone Green and Vigo are third tier settlements with limited services and facilities.
- Would create a scale of development which could help to retain and enlarge the number of services and facilities.
- Each of the settlements would have some bus services and Meopham/Sole Street and Higham/Lower Higham would have regular train services.
- Would result in the loss of the individuality of each of the existing settlements involved in a merger and the scale of development could adversely affect the character of the settlement.
- Possibility of some higher density development close to public transport facilities.
- There are no readily identified, clearly defined boundaries to growth.
- Culverstone Valley area consists of many individual land ownerships, some of which are already developed. This could delay necessary land acquisition, complicate any attempt at a comprehensive approach to development and add to the cost of the development.
- Scale of development would require a phased approach to delivery and so would not be completed within the plan period and would, in effect, be part of a longer term planning strategy for growth.
- Could require some additional land releases to ensure that the 2028 target is met.
Option 6

Creation of a Freestanding New Settlement

- No site has been identified and, until that occurs, it is impossible to say whether clearly defined boundaries to growth exist.
- The settlement would need to be of a sufficient scale, of about 5,000 to 7,000 dwellings, to meet development needs for housing, employment, retail and leisure uses and to provide the full range of infrastructure, service and facility needs of a new community.
- The timescale of development would extend beyond 2028 and the settlement would form the focus for long term development, meeting post 2028 needs.
- Other development at other locations might be required to meet ongoing development needs in the short term.
- Depending on location, it could provide an opportunity to avoid urban expansion and its consequential narrowing of the gap between the urban areas.
- Opportunity to provide for affordable housing and other rural special housing needs but not at those settlements where the need arises.
- Would require the provision of regular, accessible public transport.
- Would affect the character of the rural area but would not have an impact on the existing rural settlements, whilst providing the opportunity through a master plan, to design and create a settlement with a character of its own.
- Possibility of some higher density development close to public transport facilities.
Other options

The process of Duty to Co-operate means that we can ask other local authorities in our housing market area (principally Dartford and Medway) to take some of our housing need (along with jobs etc. that goes with them). The Government has made proposals to strengthen this process – but it remains a duty to co-operate not a duty to agree. No Authority is going to accept additional housing they cannot accommodate. Other Councils may wish to ask Gravesham to take some of their need.

If Gravesham were not to meet its assessed needs it would have to show that the environmental and other constraints were sufficient to restrict the scope for development and ideally another Authority has to agree to take some of this unmet need.

What next?

Please complete the questionnaire or respond via the web site. Your views and comments will be considered and further technical work will be carried out on specific sites. This will include whether sites will actually be deliverable – or what needs to be done to make them so. This will include looking in more detail at the transport implications, which needs to take account of the impact of development in the rest of Kent on the road and railways. Council Members will then decide the way forward which will lead to a fresh round of consultation in autumn 2019. Consultation on the submission plan would be in 2020, leading to submission, examination and adoption in 2021.