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Forward

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
Note:

This document was largely prepared before the Government issued its consultation on revisions to the National Planning Policy Framework and related guidance in March 2018\(^1\). Some minor amendments have been made to take account of these proposals. In taking the Local Plan forward the Borough Council will have to have full regard to the final version of the Framework which is expected to be issued in summer 2018.

1. Introduction

1.1 This document, entitled Site Allocations: Issues and Options, is the subject of consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Together with a separate Development Management Policies document, which is the subject of parallel consultation, it will inform a comprehensive Site Allocations and Development Management Policies Development Plan Document which, together with the existing adopted Gravesham Local Plan Core Strategy, will complete the Local Plan.

1.2 Gravesham Borough Council has a duty to prepare a Local Plan for the whole Borough, including the area for which the Ebbsfleet Development Corporation (EDC) is the Development Management Authority. The National Planning Policy Framework\(^2\) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

1.3 For convenience this Stage 1 consultation is divided into two parts:

- Part 1: Site Allocations: Issues and Options: this looks at options for additional land suitable for the development of homes and jobs that were not allocated or permitted when the Core Strategy was prepared, in the light of revised estimates of need from fresh technical work; and
- Part 2: Development Management Policies: eventually these will replace the saved policies from the Gravesham Local Plan First Review (1994) and provide further more detailed guidance for the consideration of planning applications taking account of the Core Strategy policies and Government guidance.

1.4 There is also a non-technical booklet setting out the main issues in a summarised form, along with a questionnaire.

1.5 The responses to this consultation, along with further technical work listed in section 8, will be considered by the Council in preparing draft proposals for the Site Allocations part of the document. This will form a further consultation (Regulation 18 Stage 2) which will be undertaken in 2019.

1.6 The consultation period for this Regulation 18 Stage 1 consultation starts on 25 April and runs for eight weeks. Responses should be made by 5pm 20 June 2018 via http://localplan.gravesham.gov.uk/yoursay and/or by completing the questionnaire sent to all households and businesses in the Borough. A full set of consultation documents is available via the Council’s consultation portal and will be accessible in Gravesham Gateway and public libraries. Responses to this consultation can also be sent by email to planning.consultation@gravesham.gov.uk or post to Planning Policy, Gravesham Borough Council, Civic Centre, Gravesend DA12 1AU.

1.7 All detailed responses will be made publicly available, however any personal details provided on the questionnaire sent to households and businesses will remain confidential. To aid a future public examination of this document it will be necessary to publish the names of those individuals, businesses or organisations commenting on the main consultation documents. Petitions will be treated as a series of individual representations provided there is a readable and verifiable name and address.

1.8 This is the Part 1 document on Site Allocations: Issues and Options which currently focuses on potential changes needed to Local Plan Core Strategy Policy CS02: Scale and Distribution of Development. Part 2 which focuses on Development Management policies can be found at https://localplan.gravesham.gov.uk/consult.ti/dmpreg18

Structure of this document

1.9 The information on which this consultation is based is wide ranging and detailed, as is the Plan making system. This report is therefore structured to aid the reader in exploring topical areas of interest. The various parts are:

- Section 1: Introduction explains the overall background, process and the challenges the Borough faces (this section);
- Section 2: Explains the challenges in more detail;
- Section 3: Explains at a more technical level how the housing need figure has been derived;
- Section 4: Explains the detail for employment and retailing;
- Section 5: Looks at the environmental constraints and opportunities;
- Section 6: Examines some of the infrastructure issues;
- Section 7: Looks at the opportunities and options available for meeting the borough’s requirements; and
- Section 8: Charts the way forward

The challenge

1.10 At present the Borough’s Development Plan consists of:

- Local Plan Core Strategy and Policies Map (adopted September 2014)
In addition, there are some Supplementary Planning Documents and Guidance to assist developers, for example on car parking standards. These will need to be revised and brought up to date.

1.11 The Local Plan Core Strategy, adopted in September 2014 has a time horizon to 31 March 2028. It seeks the delivery of at least 6,170 homes between 2011-2028, Table 5 of the adopted Core Strategy identifies that 1,240 of these homes have to be delivered on unallocated sites. The Local Plan Core Strategy indicates that the Site Allocations and Development Management Policies Document will need to allocate 460 homes, with an additional 780 homes anticipated as being delivered on small and large site windfalls. As stated in the Local Plan Core Strategy there is a need for the Council to undertake and take into account the findings of an updated Strategic Housing Market Assessment (SHMA) and Strategic Land Availability Assessment (SLAA).

1.12 The need for this work is reinforced by Government guidance issued by the Ministry for Housing, Communities and Local Government which requires Local Planning Authorities such as Gravesham Borough Council to review their Development Plans, in part or as a whole, every five years to ensure they remain up-to-date and valid. Such a review can only be undertaken in an informed manner and requires analysis of development requirements for the local area and the wider market in which we operate and for a wide spectrum of uses such as housing, commercial, retail and leisure floorspace, schools, health facilities, etc. Initial work undertaken on behalf of the Council has identified a need for more homes and economic development to build a sustainable community. In particular the latest technical work suggests an objectively assessed need for 7,905 homes rather than the 6,170 homes that are provided for in Policy CS02 in the Core Strategy. The new Government methodology would make that figure 8,035 homes.

1.13 The challenge for the Council and local area is to explore how and if we could accommodate this scale of development, along with the jobs, retail floorspace, transport infrastructure, schools etc. needed to support it. This is in the context of a multitude of environmental constraints, major uncertainties on some major developments including proposals for nationally significant infrastructure projects, potential changes to Government funding, policy and guidance, and what the development market is prepared to deliver.

1.14 The Site Allocations: Key Issues and Options part of this consultation is focusing on finding the right approach to this challenge in order to identify what changes may be needed to Local Plan Core Strategy Policy CS02. It is not at this stage seeking to identify specific sites for allocation. The findings of this consultation and further technical work will assist the Council in preparing a more refined consultation for 2019. This second consultation will include more specific proposals, which in turn will at a later date lead on to a complete Site Allocations
and Development Management Policies Document being submitted for examination to an independent Inspector and eventual adoption.

Starting point

1.15 The Inspector’s report\(^3\) finding the Local Plan Core Strategy ‘sound’, did so on the basis that the Council looked again at:

- The quantities of homes and jobs required in the future; and
- Where the identified homes and jobs needed should be located, including whether Green Belt boundaries needed to be altered to accommodate this development. The Culverstone Valley Area was identified as an area that needed further consideration.

1.16 This consultation document, along with the supporting technical reports, and the evidence base from the Core Strategy, where relevant, presents an overview of the work that has been carried out. For more detailed supporting information please read these documents, referenced by the footnotes.

1.17 It is important to state that the process, as required by Government guidance, has to consider all reasonable options to meet identified development need. It is not possible to arbitrarily reject options before they have been properly considered on the basis of evidence. It is also a requirement to produce a Local Plan that is coherent. A particular choice on one topic or in a geographical area will have implications elsewhere in both the Borough and in the plan. It is therefore necessary to look at sites for development both on their own, but also in combination with existing, proposed and other potential development proposals / options.

1.18 The consideration of development requirements and options for delivery, also have to make sense as part of a wider process. For example, through the Duty to Co-operate process there is a need to consider a wider area than just Gravesham when considering the need for jobs and homes and how the needs of the wider employment and housing market are being met across North Kent. In the same way the Green Belt performs local functions but is also part of the Metropolitan Green Belt around London, therefore Duty to Co-operate has to tackle the wider strategic role of the Green Belt and changes being made or not made elsewhere.

National context

1.19 The planning system has been undergoing constant change and development. A White Paper (Fixing our Broken Housing Market) was issued in February 2017, for consultation. The outcome of this consultation was published by the Ministry for Housing, Communities and Local Government in February 2018 and has resulted in The Town and Country Planning General (Amendment) (England) Regulations 2018 laid before Parliament on 31 January 2018 and which came into force on 23 February 2018.

1.20 In September 2017 the Government consulted on “Planning for the right homes in the right places”. This consultation focused on a national standard approach to calculating housing need and strengthening the Duty to Co-operate process. This has been followed up in March 2018 by a consultation on possible changes to the National Planning Policy Framework and related guidance. It is likely that as work on this Site Allocation and Development Management Policies document progresses consideration will need to be given to the outcomes of these consultations. Government guidance and legal judgments require that any future Local Plan documents will have to be produced under the legal framework and guidance operative at the time. This includes case law provided by court judgements and the approach taken by Inspectors in dealing with other Plans and planning appeals. Therefore, there is scope for the Site Allocations and Development Plan Policies document to evolve, just like the Local Plan Core Strategy did, until it is adopted.


1.22 The complete Local Plan has to take on board the National Planning Policy Framework (NPPF) and Planning Practice Guidance, provided by Government.

1.23 The other critical component is the Duty to Co-operate that applies to all planning authorities (and some other bodies), and provides a context for dealing with issues that impact a wider area e.g. issues that affect North Kent, Kent and the South East. This includes considering matters which are not issues in Gravesham but may be issues for others. The proposed changes to the NPPF will require local authorities to enter into and maintain statements of common ground on cross boundary issues, and record the progress being made on them. It is not a duty to agree.

1.24 A number of changes have occurred since the evidence base for the Core Strategy was prepared:

- A Strategic Housing and Employment Needs Assessment (SHENA) has been prepared covering housing, employment and retail. The Strategic Housing Market Assessment (SHMA) element of this has produced higher dwelling numbers, and a consequential revision of the employment and retail requirements together with information on site viability;
- An updated draft Strategic Land Availability Assessment (SLAA), which examines the sites that have been put forward by land owners and developers in the Borough for development;
- Work has been undertaken on analysing parcels of land within the Green Belt, environmental constraints, potential development options and landscape appraisal;
- Ebbsfleet Development Corporation (EDC) has come into existence and is driving forward development in the Ebbsfleet and Northfleet Riverside areas, including the
direct provision of some infrastructure;

- The Government has selected a route corridor east of Gravesend as its preferred alignment for a Lower Thames Crossing, linking the M25 to the A2. Improvements to the Ebbsfleet and Bean junctions on the A2, in Dartford Borough, are also being promoted.
- London Resort Company Holdings is continuing to develop its proposal for a leisure resort on Swanscombe Peninsula (mainly in Dartford Borough), which has significant implications for employment, housing, transport and other development in Gravesham;
- The possibility of extending Crossrail 1 (the Elizabeth Line) towards Ebbsfleet is being examined; and
- The decision to leave the European Union in March 2019 with consequential uncertainty for the economy and international migration levels in the future.

1.25 The full implications of some of these proposals and changes are not clear at present, and in any case delivery of them may be some time away and is not guaranteed. For example, the Lower Thames Crossing could not open before 2027. The precise alignment has potential implications for the location of development on the east side of Gravesend, quite apart from impact on the wider transport network. None of the highway schemes or the London Resort proposal yet have planning permission, so cannot be taken as given at this stage.

Duty to Co-operate

1.26 The Duty to Co-operate is a requirement of the 2011 Localism Act which abolished regional planning. It requires Local Planning Authorities to work together on matters that span one or more Local Authorities. The Council has regular discussions with adjoining (and wider) Local Planning Authorities on matters of mutual interest.

1.27 Of particular relevance in this context is whether any of our neighbouring planning authorities are able to take some of our housing demand (and the employment, retail etc. that goes with it). On this basis, Dartford Borough Council and Medway Council have already been sent preliminary letters about that possibility, which will be discussed further as part of this consultation process. They first need to see the options for Gravesham to try and meet its own need and fully understand the implications of such a move for them.

1.28 The Mayor of London is also working on a full review of the London Plan (the Mayor’s Spatial Development Strategy). Public Consultation on this took place early in 2018 and there has been engagement via the South East England Councils organisation. The strategy may have implications for Gravesham as it falls within the Thames Gateway corridor to the east of London. There are particular issues relating to housing supply, employment land and transport links. The Mayor of London has a slightly different legal process to follow compared to other Local Planning Authorities, with a Duty to Inform rather than Co-operate.

1.29 The Thames Estuary Commission has been set up by the Government to look at the
vision for the Thames Estuary; this has a 2050 time horizon. This may provide some wider context for development in Gravesham.

1.30 Given the scale of future housing and employment demand, Government policy and the comments by the Inspector on the Core Strategy, it is therefore necessary to consider a wide range of options for meeting development needs across Gravesham. The purpose of this consultation is to establish views on the way forward to allow the Borough Council, having considered the evidence, to arrive at its proposals.

Strategic objectives

1.31 As a background to the discussion it is useful to restate the basic strategic objectives of the adopted Core Strategy. There are 19 of these (see sub-section 3.2), however the three core objectives are:

- **S01**: Make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend Town Centre, and at Ebbsfleet
- **S02**: Provide sufficient new homes to meet the future objectively assessed needs of the Borough’s population, to include provision of affordable homes, homes for smaller households and older people, and sites for travellers within the urban area and rural settlements inset from the Green Belt.
- **S03**: Ensure that the right amount, size and type of employment sites are available in Gravesend and Northfleet to diversify and strengthen the local economy and reduce out commuting

1.32 The Borough Council remains committed to the underlying principles of the Local Plan Core Strategy and the accompanying strategic objectives.
2. Managing Growth

2.1. This section outlines in more detail the challenges facing Gravesham to deliver sustainable development and how they might be met. On the one hand, there is the need for new homes and jobs, with all the benefits they bring. On the other are the environmental and other issues, in particular infrastructure provision, all overlain by the practical challenges of actual site delivery and viability.

The challenge

2.2. All local planning authorities are required by the Government to review their objectively assessed needs for housing, this is done via a Strategic Housing Market Assessment (SHMA). For Gravesham, the most recent SHMA identifies an Objectively Assessed Need (OAN) for 7,905 homes between 2011-2028, rather than the 6,170 contained in Policy CS02 of the adopted Core Strategy. This is a 28% increase and on the face of it this would require an amendment to Policy CS02. However, one cannot automatically translate objectively assessed need into a housing requirement that is adopted in Policy. The objectively assessed need for housing has to be considered against a host of other factors to ensure it is deliverable prior to the figure being taken forward as a Local Plan housing requirement.

2.3. As mentioned earlier, the Government recently proposed that there should be a standard methodology for calculating objectively assessed need for housing. The suggested Objectively Assessed Need (OAN) for Gravesham (at 8,035) is 13 homes per year higher than that identified in the Borough’s most recent SHMA, suggesting the results of our SHMA are robust. In 2019/20 regardless of progress made on this document, under the Government’s current proposals, the housing requirement will switch from that in the adopted Local Plan Core Strategy to the number generated by the Government under their proposed OAN methodology.

2.4. The adopted Local Plan Core Strategy has an established monitoring process, the outcomes of which are annually published as part of the Annual Monitoring reports\(^4\). If significant variances are identified within any Authority Monitoring report it may necessitate a review of the Local Plan strategy.

2.5. The Government also requires all Local Planning Authorities, such as the Borough Council to maintain a 5-year housing land supply; simply put we are required to ensure there is 5 years’ worth of housing supply that is available and deliverable in the next five years. The implications for not doing so is covered by paragraph 49 of the NPPF, which says that “relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites”. Any planning applications would fall to be assessed on the basis of the ‘presumption in favour of sustainable development’.

2.6. A recent Supreme Court judgement has clarified that any policy which impacts on housing land supply can be considered out of date where there is no 5-year land supply, but that does not mean that the policies are totally dis-applied. The Development Plan remains a primary consideration in determining planning applications. The weight given to particular policies will depend on the circumstances.

2.7. The draft SLAA gives the current land supply situation as at 1 April 2017, it should be noted that this is a snapshot in a moment in time and will need to be reviewed on an annual basis as part of the Authority Monitoring Report. The draft SLAA shows a shortfall of 1,340 dwellings (excluding windfalls) against the SHENA OAN, which is explained more fully at paragraph 2.14. This position is changing as new planning permissions are granted, and development occurs, whilst consented permissions which are not implemented expire. It is not just about land for housing but also for employment, retail and other facilities such as schools that will be needed as well.

Settlement hierarchy

2.8. The Local Plan Core Strategy already contains a settlement hierarchy though not as part of policy, which logically forms the basis of any search for sites. See figure 2.1:

<table>
<thead>
<tr>
<th>First Tier</th>
<th>Gravesend / Northfleet / Ebbsfleet i.e. the urban area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Second Tier</td>
<td>Istead Rise, Hook Green Meopham, Higham</td>
</tr>
<tr>
<td>Third Tier</td>
<td>Culverstone Green, Meopham Green, Vigo</td>
</tr>
<tr>
<td>Fourth Tier</td>
<td>Cobham, Shorne, Sole Street</td>
</tr>
<tr>
<td>Other</td>
<td>Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway, Three Crutches</td>
</tr>
</tbody>
</table>
Figure 2.1 Settlement Hierarchy
2.9. Consideration has been given to whether there is scope for a new settlement, a ‘garden village’. Given the environmental constraints, the scale of the need and the distribution of existing settlements, the current evidence indicates that there is little land in the Borough for a new village, as opposed to expansion of an existing settlements or the merging of existing settlements.

2.10. 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 longer term the provision of facilities and services in urban and rural areas as traditionally envisaged is changing significantly because of the impact of the internet. As an example, post offices and libraries are unlikely to exist in their historic form or numbers, organisations that provide cash machine networks are reconsidering their locations and numbers due to individuals and businesses using electronic banking facilities and payment systems.

Core Strategy requirement 2011-28

2.11. Policy CS02 provides for delivery of dwellings phased over time, not at a uniform rate, with 325 per year 2011/12-18/19, 363 per year 2020/21–23/24, and 438 per year 2024/25–27/28. This phasing profile has been assumed to apply in the future, as a basis for discussion. It is based on the fact that sites take time to come forward, and larger new sites will not easily deliver within the first 5 years of being allocated. Current Government guidance is favouring a larger number of smaller sites as delivery tends to be faster.

2.12. As figure 2.2 below shows, housing delivery has not kept pace with the policy requirement except in 2013/14, and the new SHMA OAN figures exacerbate this position. Going forward, there is therefore a deficit in housing provision that has to be met, as well as a objectively assessed need for housing.

Figure 2.2 Cumulative Objectively Assessed Housing Need

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5 Gravesham Settlement Hierarchy Technical Paper, 2017
2.13. As indicated above a strategic objective of the Local Plan Core Strategy is to meet as much demand as possible within the Gravesend/Northfleet/Ebbsfleet urban area (see Opportunity Area policies CS04-06 & CS21) and the villages inset from the Green Belt. Most major sites have planning permission or are already allocated for development in the Core Strategy. The preliminary analysis from the draft SLAA shows that the supply of new urban sites is diminishing and that some sites previously identified have not come forward as envisaged for a number of reasons including land ownership, viability, transport impacts, etc.

2.14. Table 2.1 below shows the current housing land supply position as at 1 April 2017. This shows that with the SHENA Objectively Assessed Need of 7,905 there is, on the assumptions made, a current shortfall of 1,340 dwellings. This is however a dynamic position depending on the progress of development and whether permissions are implemented. Given the uncertainties and the need each year for a 5-year land supply, a 2,000 dwelling shortfall has been used as a robust guide. This will be refined as the Plan develops, though uncertainties will remain.

Table 2.1 Housing land supply at 1st April 2017 (rounded)

<table>
<thead>
<tr>
<th>As at 1 April 2017</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions since 2011</td>
<td>1,330</td>
</tr>
<tr>
<td>Permitted and implemented:</td>
<td>2,620</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>1,540</td>
</tr>
<tr>
<td>that is Key Sites from the Local Plan Core Strategy that do not benefit from a permission or a resolution to be permit subject to planning obligations being agreed</td>
<td></td>
</tr>
<tr>
<td>Supply anticipated from SLAA sites in the urban area and inset rural villages</td>
<td>560</td>
</tr>
<tr>
<td>Assumed small and large scale windfalls – these are unallocated sites</td>
<td>530</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>6,580</strong></td>
</tr>
</tbody>
</table>

2.15. The SHENA work has identified that there is a demographic shift towards an ageing population that is likely to lead to an increase in demand for both adaptations to existing homes and more lifetime homes. Provision is also needed for housing schemes that include an element of care e.g. sheltered housing. In terms of other specific groups, the SHENA identifies that there is a need to provide suitable and affordable housing for younger person households, and to ensure the provision of large and affordable units for the Borough’s Black and Minority Ethnic (BME) community. In the rural area, there is a need to diversify the dwelling stock type due to a lack of terraced and flatted stock. This would contribute towards improving affordability and providing a greater mix of housing that aligns better with rural households and which contributes to addressing affordability issues.
2.16. In terms of overall affordability this is considered to be an issue and to address this, an uplift is applied to the Boroughs demographic Objectively Assessed Need for housing. However, the delivery of more homes alone will not address this issue, and it has to be tackled by safeguarding jobs in the Borough and delivering more and better quality jobs in the plan period and beyond.

Opportunity Areas - Key Sites Progress

2.17. A brief summary of progress on the key sites since the Core Strategy was approved is as follows:

CS03: Northfleet Embankment and Swanscombe Peninsula East – planning permission on Northfleet Embankment West has been granted, subject to a s.106 agreement which is nearly complete. On the East site planning permission has been granted by the Ebbsfleet Development Corporation for both residential and commercial development. On the latter, the housing numbers have increased, and the employment area decreased compared with the Core Strategy, but with the aim of keeping the number of jobs the same. Plans are being developed for a riverside Fastrack route linking the Town Centre to Ebbsfleet via these sites. Land uses on Swanscombe Peninsula East will depend on progress with the London Resort, whilst this proposal has encountered delays it is still anticipated to be implemented.

CS04: Gravesend East and North East Gravesend – additional development has been permitted and is being built at North East Gravesend (Dalefield Way). The Canal Basin Area planning permission has expired, with issues over contaminated land and land ownership to be resolved. In addition, Scotia Gas Networks has advised the Council of their intention to remove the now redundant gas holders at Canal Road.

CS05: Gravesend Town Centre – The new Rathmore Road link is complete, and a covered cycle parking has been provided at the station, together with improvements to pedestrian signage and access to the Town Pier. Design work has been implemented on the transport interchange, Gravesend Borough Market has been refurbished, however work has yet to commence on the Heritage Quarter project. The future role of other undeveloped sites is being examined.

CS06: Ebbsfleet (Gravesham) – housing development has recommenced on Springhead, and there are plans for a new primary school. Work to build a bridge over the Ebbsfleet stream into the central area is about to start. Northfleet Rise is now part of the North Kent Enterprise Zone. The EDC has prepared an Implementation Framework to help guide development, and is studying the need for investment in utilities like waste water treatment, and electricity which will be needed to support development across the wider area.

http://ebbsfleetdc.org.uk/the-vision/
CS21: Land at Coldharbour Road – outline consent has been given for 400 homes to the north of Coldharbour Road and a reserved matters planning application (20180041) has been submitted to the Council. A hotel is complete (Travelodge) and a planning application for employment uses is under consideration to the south.

2.18. It is important to state that whilst Gravesham can grant planning permissions (and the Ebbsfleet Development Corporation in its area) and encourage development, there are currently no powers to make a developer build and deliver the planning permission. Use of Compulsory Purchase Order (CPO) powers is theoretically possible, but is expensive and time consuming. Use of CPO power does not alter build or infrastructure costs, or many other issues that may impact on deliverability.

Site viability

2.19. The National Planning Policy Framework (para. 173) says that: ‘plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened’.

2.20. Housing development is expected to pay for the land and build cost, as well as the supporting infrastructure, for example improvements to roads and/or public transport, provision of affordable housing, education contributions etc. The same principle applies to commercial development. The costs of making brownfield sites fit for development may be substantial due to removing existing structures, dealing with contamination and the need to reconfigure utilities (water, sewage, power cables etc.).

2.21. As part of the technical work a study has been done which looks at site viability\(^7\), this study shows that at a generalised cost level, land values mean that some urban sites for some types and scale of development may not be viable, and therefore developers will not bring them forward in the current climate. Developers may seek to reduce the costs associated with developing a site, through negotiating reductions in S106 contributions which contribute towards the additional infrastructure needed, but that does not reduce the need for transport enhancements, health facilities, school places etc. It does however mean that alternative funding sources have to be found to deliver and maintain services.

2.22. Higher density development is also seen by some as a means of providing larger volume of dwellings in concentrated areas, with a view to maximising available public transport links and services. Local Plan Core Strategy Policy CS15 already encourages higher density development around the transport hubs of Gravesend Town Centre and Ebbsfleet, whilst also encouraging the efficient use of land in both the urban and rural areas i.e. 40 dwellings per hectare (ha) in urban area and 30 per ha in the rural. Local Plan Core Strategy policies for the Opportunity Areas and Key Sites reflect this strategic approach to densities in the Borough and provide additional site-specific guidance.

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\(^7\) Affordable Housing and CIL Viability Testing Report. January 2016
2.23. Higher densities, especially in the form of flats, whilst being capable of delivering higher numbers of dwellings also incur higher development costs when compared to terraced houses, semi-detached and detached dwellings. There is also a tension between the possibility of reducing car parking provision, enhancing public transport provision, and maximising the number of homes. These issues impact site viability along with the scale of demand for flats in the local housing market. A number of existing planning permissions are for ‘up to’ x dwellings, but recent experience in the wider area shows that developers are seeking to deliver a more suburban housing form.

2.24. A related issue is the size of site. Large sites generally require long lead times to start delivering. Smaller sites can come forward more quickly provided that singly, or in combination, they do not cross a threshold that requires major infrastructure investment. Examples would be a need for a major road junction improvement or enhancement to a waste water treatment system. Conversely a larger site may be able to pay for or justify enhancements more easily because of their scale. For example, 10 homes would not justify a new bus route but 1,000 homes might.

2.25. The viability work also provides an input to the possibility of the Council introducing a Community Infrastructure Levy (CIL) Charging Schedule, with its associated list of projects (schedule 123 list), to replace most s.106 obligations. The Government is currently reviewing CIL, and the Council will decide the way forward when it is clear what the Government’s position on CIL is.

2.26. The viability work contains some recommendations from the consultants on the possible levels of CIL charge, based on analysing various scenarios and land values in the Borough. The CIL recommendation is to have two charging zones as set out in figure 2.3. These values provide a useful insight into viability issues, and are after affordable housing and other generalised site costs have been allowed for. The data is by definition historic and if land values rise, sites will become more viable therefore potentially increasing the level at which CIL should be set, however experience has shown that as land values and property prices increase, so do development costs due to shortages of skilled labour and/or construction materials.
Figure 2.3 Possible Community Infrastructure Levy charging zones
2.27. Modelling of various scenarios identifies that when taking into account the variability of costs on actual sites, the Borough Council could propose the following CIL charges in these two areas as set out in table 2.2 below. Whilst the Council would welcome views on the suggested CIL Tariff below, we are not proposing to formally consult on or introduce CIL at this stage.

Table 2.2 Suggested Community Infrastructure Levy Rates

<table>
<thead>
<tr>
<th>Type of Development</th>
<th>Suggested CIL Tariff per sq m</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Area A</td>
</tr>
<tr>
<td>Residential below 15 dwellings</td>
<td>£60</td>
</tr>
<tr>
<td>Residential above 15 dwellings</td>
<td>£70</td>
</tr>
<tr>
<td>Retail - local convenience less than 500 sq m</td>
<td>£125</td>
</tr>
<tr>
<td>Retail - convenience 500 sq m or more</td>
<td>£125</td>
</tr>
<tr>
<td>All other Uses</td>
<td>£0</td>
</tr>
</tbody>
</table>

Infrastructure

2.28. New development, wherever it is, needs infrastructure to support it, some of which is site specific and some wider afield. This includes water supply, waste water treatment capacity, electricity, gas, education, health services, social services, leisure provision and transport. Taking transport as an example, there is both how a site might be connected to the highway network and be served by public transport, and also how it relates to the wider transport network. In Gravesham the impact on junctions onto the A2 and the operation of the Strategic Road Network is also a key consideration.

2.29. Many of these facilities and services are already under pressure from demographic changes to the population, as well as population growth both in Gravesham but also across the wider area. Detailed consideration has not yet been given to the implications on local services and facilities, of delivering the objectively assessed need for housing. This work will be undertaken to inform the Regulation 18 Stage 2 consultation in 2019, as the Plan making process will need to look in detail at refined growth options to establish with the various utilities and service providers, what is needed and how it can be provided physically and financially.
3. **Sustainable Communities**

3.1. This section explores the housing need technical issues outlined above in more detail. It also looks how the housing need has been derived.

### Strategic Housing and Economic Needs Assessment

3.2. Upon completion of the Local Plan Core Strategy examination and adoption of the Local Plan Core Strategy in September 2014, the Council began preparatory work on collating the evidence base needed to inform this consultation, following Government guidance. A key component of this work has included the preparation of a Strategic Housing and Economic Needs Assessment (SHENA) that encompasses a number of streams of work:

- Strategic Housing Market Assessment
- Employment Land Study
- Retail Study

3.3. The SHENA was commissioned by both Medway Council and Gravesham Borough Council. The outputs of the SHENA look at the growth needs of the Borough to 2037, however growth requirements are summarised to 2028 in order to align with the current Core Strategy plan period.

### Strategic Housing Market Assessment

3.4. A Strategic Housing Market Assessment (SHMA) is an assessment of peoples’ housing needs within the Borough based on statistical evidence and it identifies the Borough’s objectively assessed housing need. This evidence is used to inform the Borough’s growth requirements i.e. any changes needed to Local Plan Core Strategy Policy CS02 as well as other housing policies and proposals in our Local Plan.

3.5. The National Planning Policy Framework requires the Council to identify what the Borough’s objectively assessed housing needs are. It states (para. 47) that “to boost significantly the supply of housing, local planning authorities should - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”

3.6. In keeping with previous SHMAs this most up to date analysis identifies Gravesham’s Wider Housing Market Area (Wider HMA) as including Medway and Dartford, with the Housing Market Area itself being focused on the Borough (figure 3.1). This does not negate the significance of Gravesham’s links with other areas not included within its HMA i.e. South East London, Sevenoaks etc. The Wider HMA for Gravesham is intended to reflect the preponderance of evidence and the strongest relationships with other areas in the wider HMA.
3.7. The Planning Practice Guidance (PPG) that accompanies the NPPF, advises that, “Need for housing in the context of the guidance 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 – and should cater for the housing demand of the area … Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.”

3.8. “The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.”

3.9. As clearly set out in the PPG the Borough’s OAN must be based on fact and unbiased evidence, and at this stage no constraints can be applied to the assessment of need in order to artificially curtail the OAN of the Borough.

Figure 3.1 Housing Market area

3.10. Since 2001 the Borough’s population has increased by some 11,000 people, from 95,800 persons in 2001 to 106,800 in 2016. These are the mid-year estimates from the Office
of National Statistics (ONS). 56% of this growth is due to natural change (births exceeding deaths), 39% to net migration and 5% to other changes\(^9\). Figure 3.2 below shows how various components have altered.

**Figure 3.2 Components of population change in Gravesham 2002-2016**

3.11. Historically the level of net domestic migration was negative, counteracting international migration. However, in 2012-14 this trend reversed, which when combined with increased births, has increased the overall population. Migration varies considerably from year to year so has to be looked at over a longer period.

3.12. The period used for the migration component makes a considerable difference to the end result. For example, ONS 2013 base projections for the Core Strategy gave an increase to 2028 of 8,800 persons, ONS 2012 based projection gives 14,100 and the latest 2014 based projection gives 18,100.

3.13. An unconstrained OAN for the Borough is considered in significant detail within the SHMA, a multitude of factors are considered and scenarios modelled before the OAN is set out. Table 3.1 sets out the various modelled scenarios, and the starting point Household Projection (HP) refers to the 2012 based Household Projection. At the time of modelling the base data available from ONS and the Department for Communities and Local Government (DCLG) included:

- 2012 based Household Projections (DCLG)
- 2012 based Population Projections (ONS)
- Mid-Year Estimates Series to 2014 (ONS)

\(^9\) Other changes comprise alterations in the size of the armed forces stationed in the UK and other special population adjustments by ONS
3.14. Table 3.1 shows the different scenarios considered with scenarios 1-5 projecting dwelling growth requirements of between 451-465 dwellings per annum in the Borough. Given the fluctuations in population growth and levels of migration in preceding years, it is considered that as a starting point it may be prudent to select an OAN based on long term migration modelling. This would be in keeping with the approach currently used in the Local Plan Core Strategy. However, this would not address un-attributable population change (UPC). As set out in the SHMA, taking UPC into account is a matter of judgment. In Gravesham’s case taking account of UPC would reduce the annual dwelling need of the Borough to 453 dwellings per annum. However, given the nature of UPC and the uncertainties associated with it, a pragmatic approach is advised which takes an average figure for the long-term migration scenario adjusted and unadjusted for UPC. For Gravesham this equates to 465 dwellings per annum, however as this figure does not address affordability or market signals it is not selected as the Borough’s OAN.

Table 3.1: Summary of SHMA Scenarios for the Borough

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Annual Growth (2012 to 2037)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Households per annum</td>
</tr>
<tr>
<td>1 Household projection (HP)</td>
<td></td>
<td>445</td>
</tr>
<tr>
<td>2 HP including 2013 and 2014 MYE</td>
<td></td>
<td>440</td>
</tr>
<tr>
<td>3 Long term migration</td>
<td></td>
<td>465</td>
</tr>
<tr>
<td>4 Long term migration UPC</td>
<td></td>
<td>441</td>
</tr>
<tr>
<td>5 Average long term migration</td>
<td></td>
<td><strong>453</strong></td>
</tr>
<tr>
<td>6 Sector growth (ELNA* Synthesis 1)</td>
<td>Economic Activity</td>
<td><strong>453</strong></td>
</tr>
<tr>
<td></td>
<td>Sensitivity 1</td>
<td></td>
</tr>
<tr>
<td>7 Sector growth (ELNA* Synthesis 1)</td>
<td>Economic Activity</td>
<td><strong>386</strong></td>
</tr>
<tr>
<td></td>
<td>Sensitivity 2</td>
<td></td>
</tr>
<tr>
<td>8 Sectors &amp; London Paramount* Indirect</td>
<td>Economic Activity</td>
<td><strong>555</strong></td>
</tr>
<tr>
<td>(ELNA* Synthesis 2)</td>
<td>Sensitivity 1</td>
<td></td>
</tr>
<tr>
<td>9 Sectors &amp; London Paramount* Indirect</td>
<td>Economic Activity</td>
<td><strong>485</strong></td>
</tr>
<tr>
<td>(ELNA* Synthesis 2)</td>
<td>Sensitivity 2</td>
<td></td>
</tr>
<tr>
<td>*Now known as London Resort</td>
<td>*Employment Land Needs Assesment - See Section 4</td>
<td></td>
</tr>
</tbody>
</table>

3.15. Having considered demographic scenarios, the SHMA goes on to consider economic scenarios (Table 3.1, scenarios 6-9) that may influence the Borough’s population through requiring a larger workforce. Traditional sector growth in the Borough would not place any additional demands on the Borough’s population, however the delivery of the London Resort would. Whilst it is for Dartford Borough Council as the host authority for the London Resort to address the requirements of the additional workforce needed by London Resort through the Duty to Co-operate i.e. the direct workforce, assumptions have been made related to the
indirect jobs London Resort would create in Gravesham. These indirect jobs would generate requirements for a larger workforce in the Borough and thus result in a higher population and dwelling requirements under scenarios 8-9, see Table 3.1.

3.16. The market signals and affordability evidence set out in the SHMA e.g. house prices, vacancy rates, concealed households, overcrowding, and rate of development suggests that there is evidence of housing supply and demand imbalances in the Borough. These imbalances would justify an increase to the average long-term migration scenario (465 dwellings per annum).

3.17. The PPG does not set out how any demographic projection should be adjusted to address market signals and affordability. However, it does say that the increase should be appropriate for the scale of demand and the local context. Of the modelled scenarios set out in Table 3.1, only scenarios 3, 8 and 9 would deliver dwelling increases above the long term migration scenario. However, as scenario 3 would only be a marginal increase of 2% it is discounted. Table 3.1 scenario 8 with an annual need for 569 dwellings per annum, provides a significant increase (22%), whilst scenario 9 with an annual need for 495 dwellings per annum provides an increase of 6%.

3.18. On balance considering the evidence available the Strategic Housing Market Analysis (SHMA) considers that increases in economic activity are likely given trends in the latest Census, changes in the provision of pensions and the statutory pension age. This would suggest that the figure of 495 dwellings per annum is appropriate to meet growth rates set out in scenarios 6 and 9, whilst providing flexibility to address market signals and affordability issues.

3.19. The OAN recommended by the SHMA therefore is for at least 495 dwellings per annum to be delivered in the Borough to 2028. The implications of this OAN, when compared to the existing Local Plan Core Strategy target is illustrated in Figure 3.3 and Figure 3.4

![Figure 3.3 Core Strategy and SHMA housing targets – dwellings per year](image)
3.20. The NPPF requires that a Strategic Housing Market Assessment (SHMA) be carried out to provide, as a starting point, an objectively assessed need for housing (para 47). The Plan should be seeking to meet this need as a starting point. This need has to be assessed against the constraints: environmental, infrastructure and policy. The requirements for employment, retail floorspace and other land uses then flow from this and need to be taken into account.

3.21. The SHMA also needs to look at the structure of the demand and the types of housing that need to be provided as a result. This includes the proportion of ‘affordable’ homes, as well as the size of properties (number of bedrooms), and any special needs, such as sheltered housing. The population is increasing in the 60+ age range and appropriate provision needs to be made.

3.22. Analysis starts with current trends in births and deaths (natural change), and migration (national and international). This has to be based on past trends, which are not necessarily a guide to the future. Thus, Gravesham has historically received people moving out of London and exported residents further east into Kent. It cannot take account of, say, the impact of leaving the European Economic Union as there is no evidence of what this will be – but it is possible to look at the sensitivity of the assumptions used. Any strategy will need to monitor what actually happens in the future and take appropriate action.

3.23. Currently the Core Strategy requires the average delivery over the 2011-2028 period of 363 dwellings per year. This is phased in recognition that large sites take time to start delivery due to the planning processes that need to be followed and infrastructure that is needed. Smaller sites can come forward more quickly but cumulatively may hit thresholds in infrastructure provision.
3.24. The Core Strategy identifies sites (with planning permission and allocated) for about 4,940 homes, including an allowance for small sites. There are sites under 5 dwellings from which historically a steady supply has come forward, and this is assumed to continue into the future. This left a gap of 1,240 dwellings to find sites for.

3.25. The new SHMA sets out a 2011-28 requirement for 7,905 homes, or 495 homes per year ignoring phasing. This generates a gap of approximately 1,340 dwellings when under-delivery is taken into account. As noted above this figure will vary with time as development does or does not proceed and excludes unallocated windfall development.

3.26. In looking at the overall numbers it is relevant to note that there are various types of specialist provision that need to be provided for and may have specific locational requirements. This would include affordable housing, older persons accommodation and sheltered accommodation.

3.27. Gypsy and travellers accommodation also has to be considered. The Borough Council has commissioned a new study of this jointly with Medway Council, the results of which will be taken into account in future consultations.

Strategic Land Availability Assessment

3.28. The draft Strategic Land Availability Assessment looks at the supply of land that has been identified by a number of means:

- Planning permissions;
- Allocated sites and sites that previously had planning permission;
- Sites put forward by land owners; and
- Some additional sites that the Planning Authority feels need to be considered.

3.29. Each site needs to be assessed on the basis of:

- Suitability – is it well located for the provision of services?
- Availability – is the land owner willing to sell for development?
- Achievability – is it viable and deliverable?

3.30. The results of the draft SLAA suggest that the current housing supply identified by land owners and developers is in the order of 7,900 homes on land in the rural area. These are sites suggested by land owners and developers which the Borough Council has to consider but this does not imply any form of acceptance. A significant number of homes can be discounted because of the assumed route for the Lower Thames Crossing (which landowners were not aware of when the call for sites was made) and other factors.

3.31. The Broad Locations Assessment looks at the opportunities and constraints at a general level in the rural area to provide the basis for a more detailed assessment. It should be
emphasised that this is not a full Green Belt Review but the assembly of information that would inform such a review and provides guidance at this stage. More detailed work will need to be carried out on a selection of specific sites for their practicality and deliverability for the second stage Regulation 18 consultation.

3.32. Sections 5, 6 and 7 look at the various factors in more detail and the constraints and opportunities they offer. Some of these can be overcome if the development can afford to pay, for example, for highway improvements. Others cannot, for example flood risk or the highest levels of environmental protection.

3.33. The objective of this phase of the process is to identify locations which can be explored further to check that sites are actually deliverable. This will include examination of site economics, including whether transport issues can be dealt with etc.

3.34. The final element is that demand does not stop growing at 2028 – that is the time horizon of the Core Strategy. That said it may be that there is limited scope to accommodate additional development whatever the demand may be, due to environmental and infrastructure constraints or other reasons.
4. Economic Prosperity

4.1. This section examines the detail of the employment and retail studies that follow from both the housing need assessment and particular local circumstances in those topic areas.

Employment

4.2. With the housing requirement comes the need for employment opportunities, for both existing and future residents. This requires sites that meet current market aspirations if they are to be developed. From business inquiries received there is latent demand from existing and external businesses for commercial floorspace and new commercial units, but with an emphasis on locations that are well located to the strategic highway network, i.e. at or near A2 junctions.

4.3. There have been some very obvious trends, for example the conversion of 1960’s/70’s office buildings in and around the town centres into residential (now permitted development in certain circumstances). Employment development has yet to occur at key development locations such as Ebbsfleet and the London Resort proposal (with 15,000 jobs) can only be treated as a possibility. The Borough Council and Ebbsfleet Development Corporation are actively exploring various approaches to business development along Northfleet Riverside, parts of which are now in the North Kent Enterprise zone.

4.4. Graveshams has the smallest economy in Kent and Gross Value Added (GVA) is one of the lowest in the South East. GVA is a measure of the size of the local economy, and is not a measure of the income of Gravesham residents.

Figure 4.1 Gross Value Added per head 2015
4.5. 66% of the workforce leaves the Borough for work every day. Whilst Local Authority boundaries are arbitrary the objective is to achieve more local job opportunities, which are more sustainable as they reduce commuting. In 2011 65% of journey to work trips were by car and motor cycle and 27% by public transport (including walking and cycling). 8% work at home which is a growing trend to be taken into account. Increasingly for some workers there is no need to go into the office 5 days a week, so Fridays for example are noticeably quieter on the roads and railways. The Council recognises that traffic congestion is one of the reasons that people can be anti-growth.

Employment Land Needs Assessment (ELNA)

4.6. The baseline Experian forecast for Gravesham sets out the ‘business as usual’ employment growth scenario for the Borough to 2028 across 38 economic sectors. Having reviewed the baseline position, the ELNA considers a range of scenarios for the future shape of employment in the Borough. This is then translated into growth requirements linked to employment floorspace and land requirements needed.

4.7. It should be noted the range of scenarios considered excludes direct jobs within London Resort, as these direct jobs will be delivered mainly in Dartford, and thus they would have no implications for floorspace delivery within Gravesham. The implications for Gravesham in terms of direct jobs, would be linked to the Borough’s working age population and out commuting to Dartford. This would be the subject of Duty to Cooperate discussions between Dartford and Gravesham.

4.8. The different scenarios (table 4.1) are:

- Baseline – the baseline is an Experian economic forecast for ‘business as usual’ in Gravesham to 2028 across 38 economic sectors

- Manufacturing growth – whilst it has reduced in scale, Gravesham maintains an industrial and manufacturing base which has future growth potential above and beyond the baseline trend. This scenario factors an additional 1.1% growth per annum on specific economic sectors i.e. Metal Products, Computer & Electronic Products, Machinery & Equipment, Transport Equipment and Other Manufacturing sectors from 2020.

- Distribution & Logistics growth - growth in this scenario is driven primarily by demand for distribution services to service retail activity. The historically muted performance of the sector within Gravesham is reflected within the base forecast growth figures, which show a potential decline in employment and, hence, growth needs. However, the ELNA review of the market suggests that if land were available it would generate demand and be taken up. Therefore, to understand the potential implications of growth within

10 Experian are a provider of economic forecasts. They undertake forecasts and analysis of the UK’s regions and provide valuable insight into the economic and demographic indicators for the UK and sub-areas. This data enables us to understand more about short and long term economic impacts that effect Gravesham.
the sector, an alternative growth rate is tested, based on the average for the more established market areas of Thurrock, Dartford and Swale within the Experian model. This projects an average annual growth rate of 1.25% within the wholesale sector and 1.5% within the Land Transport, Storage and Post sector.

- Demographic led growth - to understand the implications of providing sufficient employment to align with housing growth, this scenario considers the local employment requirements generated as a result of a demographically driven OAN (please see the SHENA for further information).

- London Resort supply chain impact – The 2014 Preliminary Environmental Information Report (PEIR) produced by London Resort identifies significant ‘indirect’ and ‘supply chain’ opportunities. The PEIR identifies that a total of 10,465 FTE jobs would be delivered as a result of the ‘indirect benefits’ of the resort. Of these jobs London Resort estimate that 4,570 FTE jobs would be within the ‘local area’ (i.e. Dartford and Gravesham Boroughs). The share of this employment that would be located within each borough is not identified, however given the position of the proposed resort on the borough boundary and the relative proximity and capacity of employment land within each borough, it is not unreasonable to expect that jobs will be shared equally between Dartford and Gravesham.

- This would see approximately 2,285 FTE jobs generated within Gravesham and assuming these come forward over a 5-year period from 2020, this would result in an additional 457 FTE jobs per annum. Based on consultation with Volterra (who provide the economic impact assessment for the proposed resort) the ELNA concludes that the London Resort would result in growth within the following sectors; Other manufacturing 2%, construction 6%, wholesale 13%, land transport 24%, air & water transport 1%, media 2%, telecoms 1%, computing 4%, professional service 16%, administration and support services 32%. These additional jobs have been added in to the baseline forecast with for the period 2020- 2024, with baseline growth rates applied after this period.

- Synthesis 1: Sector based growth - This synthesis forecast draws on the scenario tests above that estimate the manufacturing as well as logistical and distribution sector capacity and prospects for Gravesham.

- Synthesis 2: Sector growth and London Resort indirect impact – This synthesis scenario combines the impact on employment land requirements of sector based growth set out in Synthesis 1 and the additional employment required to service London Resort i.e. the supply chain impact scenario.
Table 4.1: Employment Scenarios

<table>
<thead>
<tr>
<th>Table 4.1 Employment Scenario’s</th>
<th>Office (B1a/b)</th>
<th>Industrial (B1c/B2)</th>
<th>Warehouse (B8)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Change in floorspace (m²)</td>
<td>Change in land requirements (ha)</td>
<td>FTE Jobs Created</td>
</tr>
<tr>
<td>1 Baseline</td>
<td>26,000</td>
<td>3</td>
<td>480</td>
</tr>
<tr>
<td>2 Manufacturing growth</td>
<td>26,000</td>
<td>3</td>
<td>480</td>
</tr>
<tr>
<td>3 Distribution &amp; Logistics growth</td>
<td>27,000</td>
<td>3</td>
<td>530</td>
</tr>
<tr>
<td>4 Demographic led needs</td>
<td>26,000</td>
<td>3</td>
<td>460</td>
</tr>
<tr>
<td>5 London Resort supply chain impact</td>
<td>37,000</td>
<td>4</td>
<td>1400</td>
</tr>
<tr>
<td>6 Synthesis 1: Sector based growth</td>
<td>27,000</td>
<td>3</td>
<td>880</td>
</tr>
<tr>
<td>7 Synthesis 2: Sector growth and London Resort indirect impact</td>
<td>36,000</td>
<td>4</td>
<td>1670</td>
</tr>
</tbody>
</table>

4.9. To deliver the OAN selected in the SHMA, the ELNA growth forecast to be taken forward is identified as being Synthesis 2 i.e. sector growth and London Resort indirect impact. The ELNA growth forecasts make it clear that despite the historic low performance in terms of employment growth in Gravesham, there is potential for additional floorspace over the plan period, as long as the nature, scale and location of space is appropriately orientated.

4.10. The delivery of employment floorspace within Ebbsfleet (Springhead Quarter and Northfleet Rise Quarter) is part of the catalyst of regeneration offered by the Ebbsfleet Development Corporation. However, much of this is intended to be Grade A office floorspace, which is not suitable for meeting the needs of small and medium sized enterprises SMEs. As a result, the ELNA advises that a focus should be placed on the provision of good quality managed and serviced office space in accessible locations, such as Gravesend Town Centre, to enable smaller businesses to remain and locate in the borough.
4.11. The opportunities offered by Ebbsfleet should not be at the expense of indigenous growth, which if suitable investments are made can be capitalised upon within the short term. Due to the fragility of the local office market, it needs to be grown organically, with a focus placed on providing appropriate space for SMEs from the indigenous business stock or SMEs attracted to the area as a result of its improved transport links and shifting economic drivers. The ELNA sets out that smaller, managed workspaces together with follow on space will provide an appropriate platform in a range of locations to support growth in the future.

4.12. The review of the existing portfolio of employment land and floorspace highlighted the limitations of the current stock. Whilst, in general, most sites are occupied with limited vacant units, it is clear that the offer to business is relatively narrow, both in terms of the type of space, its age and the scale of floorspace provided. Fundamentally the stock is focussed on providing mid-sized light industrial/warehouse units with few larger units and limited provision of good quality office space.

4.13. At present only one future employment site is identified as lying outside of the complex regeneration schemes (land at Coldharbour Road), but this has limited capacity. It is, therefore necessary to kick-start economic growth and to ensure the opportunities arising from North Kent Enterprise Zone, London Resort, Lower Thames Crossing and the Development Corporation are maximised to demonstrate that Gravesham has a range and choice of sites which can be made available to the wider employment market. This can be achieved through the identification of employment development capacity for SME office space, business parks, industrial and warehousing stock within existing settlements by clearly demonstrating where parcels can be brought forward early within larger mixed use locations. However, it also requires the identification of ‘standalone’ employment development opportunities, that can be delivered outside of these areas in order to enable choice and to cater for differing occupiers. At present apart from Coldharbour Road, it is unclear where such opportunities exist. This would help address the qualitative needs within the sector despite a significant potential level of quantitative supply.

4.14. The results of the employment study suggest that the Borough needs in the order of 4ha of office floorspace, 4ha for general industrial use and 2ha for warehousing. The Ebbsfleet Planning Permission already provides for significant business development but that will be unlikely to meet general industrial or warehouse needs.

4.15. If the London Resort proposal receives planning permission and is built that would provide jobs for Gravesham residents. There would be additional jobs generated from some of the support functions and business opportunities that would be generated. The construction phase, along with other development in the wider area, and the Lower Thames Crossing will provide demand for construction labour.

4.16. In location terms, for businesses the A2 corridor would be the preferred place for new land around the highway junctions. Northfleet Embankment already has planning permissions for employment uses, which are well connected to the A2 via Thames Way and Ebbsfleet
Parkway. Northfleet Embankment West, Northfleet Embankment East and Northfleet Rise Quarter in Ebbsfleet are part of the North Kent Enterprise Zone offering financial incentives to potential future occupiers.

**Retail Study**

4.17. Retailing is a dynamic sector where significant changes have been occurring nationally. A combination of internet shopping, out of town retailing, changing shopping patterns, rents and business rates are causing significant changes and challenges in the way traditional town centres function. There is a much greater emphasis on café, restaurant and leisure uses for example, including the night time economy. As an indicator, the long-term trends show that daytime footfall measured across Gravesend Town Centre has been slowly but steadily declining.

4.18. Online retailing has in effect consumed all the growth in comparison goods, and at the same time regional centres have expanded at the expense of smaller centres. Bluewater is the ‘local’ regional centre, but Lakeside, Westfield Stratford and the West End, are all very accessible to residents of the Borough. Out of town locations remain attractive to retailers, and a number of traditional town centre businesses have migrated. A number of nationally known retailers have also been closing stores or disappearing altogether, Marks and Spencer, and BHS being the two obvious examples in Gravesend Town Centre. Their replacements tend to be value retailers.

4.19. On the positive side refurbishment of the Gravesend Borough Market Hall at a cost of £1.8m was completed in 2016, transforming the market into a thriving retail centre for local businesses, creative and food businesses.

4.20. Food retailing has seen radical change with the emphasis shifting from large out of town superstores (Morrisons, Sainsburys and Asda locally) to smaller convenience stores for topping up. There has been the expansion of the discount retailers (e.g. Aldi and Lidl), and the development of on-line shopping for groceries (e.g. Amazon and Ocado).

4.21. It should be emphasised that these are national trends and are not unique to Gravesend. By way of compensation the local population has been growing and development is occurring in areas that are in close proximity to the Town Centre. The combination of rail, bus and ferry services means that the Town Centre is and will remain a very accessible location.

4.22. The Retail Study, looks at the performance of existing retail floorspace in the Borough and reviews the performance of Gravesend Town Centre. In addition, it reviews the quantitative and qualitative need for additional retail floorspace. The quantitative need for new floorspace is calculated through a conventional and widely-accepted methodology, consistent with best practice, which draws upon the findings of a household telephone survey of shopping patterns undertaken in February 2015.
4.23. A baseline position is established utilising data obtained from Experian, which allows for the growth of convenience and comparisons goods expenditure and the required retail floor space is explored. Once the baseline is established the quantitative modelling is expanded to consider alternative scenarios that relate to the SHMA.

4.24. This allows for the differences in retail expenditure and thus retail floorspace linked to alternative population growth scenarios to be established. The population projections that have been modelled for Gravesham and Medway in our respective SHMAs include:

- DCLG Household Projections 2012 based (HP)
- Household Projections including 2013 and 2014 Mid Year Population Estimates
- Long term migration
- Long term migration inc. un-attributable Population Change (UPC)
- Average long-term migration
- Sector growth
- Sensitivity 1
- Sensitivity 2
- Sectors & London Resort Indirect

4.25. For the purposes of the study, these scenarios were narrowed down to the following four and focus on the recommendations of the SHMA:

- A: Average long-term migration scenario
- B: 2012 based sub-national household projections including 2013 and 2014 mid-year estimates
- C: Sectors and London Paramount Indirect Sensitivity 2
- D: Combination of B and C – This is done as Medway’s advised OAN is based on B and Gravesham’s advised OAN is based on C

4.26. Taking both Medway’s and Gravesham’s OAN need into account identifies that in qualitative terms at least an additional 13,200m² of comparison floorspace (Table 4.2) and 9,300m² (Table 4.3) of convenience floorspace is needed in the Borough to 2028.

<table>
<thead>
<tr>
<th>Table 4.2 Comparison Goods floorspace excluding commitments</th>
<th>2020</th>
<th>2025</th>
<th>2028</th>
</tr>
</thead>
<tbody>
<tr>
<td>Experian baseline projection</td>
<td>3,200</td>
<td>8,100</td>
<td>11,400</td>
</tr>
<tr>
<td>A - Average long term migration</td>
<td>3,600</td>
<td>8,600</td>
<td>11,900</td>
</tr>
<tr>
<td>B - HP including 2013 and 2014 MYE</td>
<td>3,400</td>
<td>8,300</td>
<td>11,500</td>
</tr>
<tr>
<td>C - Sectors and London Paramount Indirect Sensitivity 2</td>
<td>3,700</td>
<td>9,600</td>
<td>13,200</td>
</tr>
<tr>
<td>D - Combination of B and C – This is done as Medway’s OAN</td>
<td>3,700</td>
<td>9,600</td>
<td>13,200</td>
</tr>
<tr>
<td>All floorspace m² net, rounded</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 4.3 Convenience Goods floorspace excluding commitments

<table>
<thead>
<tr>
<th></th>
<th>2020</th>
<th>2025</th>
<th>2028</th>
</tr>
</thead>
<tbody>
<tr>
<td>Experian baseline projection</td>
<td>6,800</td>
<td>7,800</td>
<td>8,400</td>
</tr>
<tr>
<td>A - Average long term migration</td>
<td>6,800</td>
<td>7,900</td>
<td>8,600</td>
</tr>
<tr>
<td>B - HP including 2013 and 2014 MYE</td>
<td>6,700</td>
<td>7,800</td>
<td>8,400</td>
</tr>
<tr>
<td>C - Sectors and London Paramount Indirect Sensitivity 2</td>
<td>6,900</td>
<td>8,500</td>
<td>9,300</td>
</tr>
<tr>
<td>D - Combination of B and C – This is done as Medway’s OAN is based on B and Gravesham’s OAN based on C</td>
<td>6,900</td>
<td>8,500</td>
<td>9,300</td>
</tr>
</tbody>
</table>

All floorspace m² net, rounded

4.27. The Retail Study identifies that the traditional high street continues to face a number of challenges stemming from the impacts of the global financial crisis and related economic downturn, which has reduced retail spending and had an impact on traditional town centre retailers. This has coincided with increased competition and changes to retail patterns as a result of the growth in online shopping and out-of-centre retailing e.g. centres such as Bluewater.

4.28. To address this increased competition the Retail Study advises that a strategy for Gravesend Town Centre should encompass the continued evolution of the high street. This would involve providing a high quality shopping ‘experience’, maximising the benefits of the tourist trade, and improving the mix of retail and non-retail outlets to increase length of stay and spend. It would also require the unique selling points of Gravesend Town Centre to be championed in order to differentiate it and its offer from other centres. This could include focusing on the River Thames, heritage e.g. the Market, tourism assets and other ‘unique selling points’.

4.29. In order to improve the range and quality of retail provision in the town centre, in order to counter the competition from Bluewater (and elsewhere) as best as is possible, the Retail Study also advises that the supply of larger floorplate units with which to attract higher quality operators to ‘flagship’ units needs to be improved. This would also assist in stemming Gravesend Town Centre moving further downmarket and assist in counteracting the loss of Marks and Spencer and BHS. The retail study identifies that this could be achieved through redeveloping St George’s Shopping Centre and delivering the Heritage Quarter development proposals.

4.30. The conclusion of this work is that the overall floorspace requirement has not changed significantly and the policy set out in Core Strategy Policy CS07 is robust. The precise location of future development may influence where particularly convenience floorspace needs to be located, but that will become apparent from future work on actual sites.
5. Environmental Protection and Enhancement

5.1. As indicated above the Borough has a wide range of environmental features. Many of these contribute to creating a high quality environment, in both natural and built form. They are an important part of the character and attractiveness of Gravesham. The weight to be placed on each of these as a constraint will vary with circumstances and the degree to which development impact can, or cannot, be mitigated. Development can be an opportunity to secure enhancement, the corridor resulting from moving the A2 being a good local example.

5.2. There are also some other constraints that need to be taken into account in looking for development locations as a result of gas and electricity networks, and potential major new transport developments that have been safeguarded.

5.3. The Local Plan process requires that a Strategic Environmental Appraisal be carried out. This has already been done for the adopted Core Strategy. For this part of the consultation, account has been taken of potential impacts on development of the scale being suggested at Borough level. More detailed work will be required on specific sites when proposals are made for them. This section gives some indication of the opportunities and challenges.

5.4. Much information already exists, and the Lower Thames Crossing and London Resort projects are carrying out extensive data collection and analysis for the environmental assessment of their respective projects. The Borough Council will be looking to build on this information base and only do additional work where required for the specific policies and proposals.

5.5. Some of these constraints have an obvious impact on potential sites for development, for example nature conservation. Others, for example air quality and noise, are a product largely of development itself and therefore need specific sites to make an assessment. That said any new development of a site not previously developed has an impact, but new development also has social and economic benefits that flow from it. Careful design can mitigate or compensate for detrimental impacts, but not in all instances.

5.6. At this consultation the constraints are being looked at in a general manner, but in the next stage more detailed consideration will have to be given, which may rule sites in or out.

Nature Conservation

5.7. The Borough has extensive areas, (figure 5.1), of nature conservation including, in order of significance:

- Ramsar (waterfowl habitat)
- Special Protection Areas (migrating birds)
- Special Areas of Conservation (other nature conservation sites)
- Sites of Special Scientific Interest
5.8. The North Kent Marshes, because of their status as an international site for birds, requires a Habitats Regulation Assessment (HRA) of any development proposals in their vicinity. This was carried out for the existing Core Strategy. The Borough Council is already collecting a tariff of £223.58 per dwelling within a 6 km buffer on the Ramsar boundary to compensate for impact on bird populations, which have been declining. The major source of this decline comes in the case of the North Kent Marshes from disturbance by people and their dogs.

Figure 5.1 Natural Environment constraints
5.9. As can be seen from Figure 5.1 there are a significant number of international or national protected areas, principally down the east side of the Borough and a large number of Local Wildlife Sites.

Landscape

5.10. The Kent Downs Area of Outstanding Natural Beauty (see figure 5.2) is an area where significant development would not be expected. It has ‘the highest status of protection in relation to landscape and scenic beauty’ (NPPF para 115). A fresh landscape appraisal has been carried out for the Borough Council\textsuperscript{11}.

5.11. The Landscape Appraisal has looked at a series of parcels around the settlements and their capacity in terms of landscape, to accommodate small, medium or large scale development ranging from 2 storey housing, through to 3 storey flats or warehousing. This shows that much of the landscape is of high quality but there are some locations where the impact of development would be less than at other locations, subject in general to it being low rise.

\textsuperscript{11} Landscape Sensitivity and Capacity Study. 2017
Heritage

5.12. The Borough has 23 conservation areas, 9 scheduled monuments and 451 listed buildings including 10 Grade I and 20 Grade II*, (see figure 5.3). The rural conservation areas have recently been reviewed, and therefore differ slightly from those shown on the Policies Map. A similar exercise will be carried out on the urban conservation areas in due course.
Figure 5.3  Heritage Assets
5.13. Sensitivity is required in development in Conservation areas, adjoining conservation areas or at or near listed buildings and scheduled monuments. The precise nature of sensitivity will vary from case to case and will depend on what features gives a building or area its significance.

5.14. Cobham Park is a registered Historic Park, with grade I listed buildings within it, which is also part of the Kent Downs Area of Outstanding Natural Beauty.

5.15. There are also areas of search for archaeology, where the County Council has indicated areas of particular interest. Anywhere along the A2 corridor for example seems to produce significant finds based on the experience of High Speed 1 and the widening of the A2.

5.16. In assessing sites at a future phase these issues will be examined in more detail.

Air Quality

5.17. Gravesham has seven Air Quality Management Areas (AQMAs). The AQMA at Northfleet was declared as a result of dust from the former Northfleet Cement Works, and subsequently from demolition of buildings, land raising and the import of cement and marine aggregates. The rest are a result of pollution from motor vehicles, most notably along the A2. Improving emissions from engines and the possible widespread introduction of electric vehicles could mitigate this in the longer term. However, this is offset by traffic growth (much originating outside the Borough) and new development produces new trips on the highway network. The proposed Lower Thames Crossing will potentially bring a major new source air pollution to the Borough, though this has yet to be evaluated.

5.18. It has become increasingly clear that air quality is an important factor in overall health. In particular the impact of particulates has been recognised as well as NOx. The Government has been developing an overall air quality strategy. It is also an area where changing technology may have a significant impact in the future. It is desirable not to increase air pollution if possible, but detailed assessment of traffic impact is required to derive any meaningful analysis.

Noise

5.19. Noise generally is a product of traffic and rail movement though there are many other sources. Industrial premises and activity on the river can also be generators. Line of sight produces the greatest impact. It is desirable to minimise additional noise but the precise location of new development and its associated infrastructure is needed to make a full assessment

Light

5.20. Most light comes from existing built-up areas, although the A2/M2 are lit and therefore
intrude into the otherwise darker rural areas. New development on previously undeveloped areas brings with it new roads and new street lighting. The type of light from street lighting has changed as a result of Kent County Council moving to LEDs. The A2 is the responsibility of Highways England and its plans for lighting in the Gravesham area are currently unknown.

Flood Risk

5.21. Flood risk, (figure 5.4), comes from two main sources; flash surface water flooding as a result of heavy rainfall overwhelming the drainage system, and the impact of a tide/storm surge on the Thames potentially overwhelming the flood defences. Due to global warming and geological factors, sea levels are rising. This means that the Thames tidal flood defences will need to be improved over time.

5.22. The Environment Agency’s response to this challenge is the Thames Estuary 2100 (TE2100) Plan, which envisages a new Thames Barrier at either Longreach, Dartford or to the immediate east of Gravesend. In either case, the rest of the flood defences will need to be raised and a new flood defence built to the east of the Gravesend urban area. However, this would mean that the risk of flooding on the marshes to the east of the new defences would increase as the existing defences here would not be raised.
Figure 5.4 Flood constraints
Agricultural Land

5.23. Figure 5.5 shows the broad agricultural land classification, with Grade 1 being the ‘best and most versatile land’. More detailed work would be required on any specific site currently in agricultural use to establish the precise qualities of the land.

Figure 5.5 Agricultural land classification
Open Space

5.25. Studies\textsuperscript{12} have been carried out on the open space, sport and recreation needs of the Borough, though the focus here is on the open spaces. Figure 5.6 shows the main formal open spaces across the Borough which perform a wide range of functions from sports pitches to country parks to play spaces. In general terms Gravesham is under-provided with formal open space compared with national standards, however the situation varies from area to area. Some open spaces also have an important role in nature conservation. One of the objectives for the Ebbsfleet area is to create the ‘garden city’.

Figure 5.6 Open Spaces
Utilities

5.26. There are utility services throughout the Borough bringing gas, electricity, telephones, cable TV, internet and water to homes and businesses and removing waste water. These networks need to have the capacity to cope with increased demand from development as well as the demand from the existing population and businesses. More detailed technical work will be required when specific site proposals are made as to whether there are any issues with additional provision.

5.27. There are some high voltage power lines and high-pressure gas pipelines that cross the Borough, which for safety and access reasons impose a constraint. In theory, some of these could be moved but this is usually very expensive and requires somewhere to move them to. That would be a major issue with power lines.

Safeguarding

5.28. Safeguarded sites, (figure 5.7) are those where there is a declared boundary for a major project on which the Borough Council needs to consult the promoter in the event of a planning application or local plan proposal. HS1 safeguarding, which is being reviewed, covers the live railway to ensure no development can impact on its safe operation. Assuming the proposals are adopted it will shrink in size. Crossrail safeguarding allows for the possible extension of trains over the North Kent Line. The Lower Thames Crossing red line boundary provides the envelope within which the detailed scheme is being developed and will be constructed.

5.29. The degree to which there is a constraint from these zones will depend on the response of the ‘owner’ of the safeguarding to any proposals, but they can be expected to object to any proposals which would significantly impact on or thwart their proposal.
Figure 5.7 Safeguarded areas
6. Quality of Life and Community Infrastructure

6.1. A key consideration, as already mentioned, is that a variety of infrastructure and services are needed to support both the existing population and future growth. A number of services are already experiencing problems due to the pressure of demand from population growth that has occurred, most notably education. Part of the overall plan process will be to examine with the service providers the future needs, taking into account their proposed methods of delivery. For example, health provision at all levels is tending to move towards delivery in large units covering a wider area (e.g. large GP surgeries). The Local Plan cannot dictate the way service providers deliver additional provision, except in so far as planning permission may be required. New development cannot address existing deficiencies though it may well assist the provider in addressing current issues.

6.2. A variety of standards exist for calculating the contribution that development may make to service provision. These requirements are however, part of the overall package that may come from a development and a balance has to be struck in achieving a useful outcome and overall site viability. Any contributions from development have to be focussed on capital investment, not meeting long term running costs.

6.3. It is not the function of the planning system to deal with existing infrastructure issues which are a matter for the service/utility provider.

6.4. The Borough Council will explore with the service providers the implications of developing different sites as part of the next stage of work. This will reveal whether there are constraints that are not easy to overcome at both a local site level and at the wider scale.

Transport

6.5. The transport networks are particularly relevant to new development as they have to accommodate not only new travel trips that will be created but also demand from the rest of Kent and internationally which is in transit across the Borough, using the same network.

6.6. The Borough is crossed in an east-west direction to the south of the urban area by the A2 trunk road which is a 4-lane dual carriageway with grade separated junctions with the M2 and A289. The M20 lies just to the south of Vigo, at the foot of the North Downs. Both roads form the main routes from the rest of Kent and Europe to London, the M25 and beyond.

6.7. The North Kent Line (NKL) and Chatham railway lines cross Gravesham linking Medway and East Kent to Charing Cross and Victoria respectively. At Ebbsfleet HS1 connects to the NKL, offering high speed services into St Pancras and international services. At peak times (especially the morning peak) the number of trains operated is at capacity, mainly due to junction and platform constraints inside London. Getting a seat on peak HS1 trains at Gravesend is difficult. Safeguarding is also in place for a possible extension for Crossrail 1 from Abbey Wood towards Gravesend.
6.8. The opening of Crossrail (in December 2018 to Abbey Wood) and the progressive introduction of Thameslink services has potential to change rail travel patterns, for example providing better access to Canary Wharf and West London.

6.9. Potential development sites in the northern part of the Borough all link directly to the A2 via one of its junctions (A289 Wainscott by-pass in the case of Higham). The southern part of the Borough feeds onto M20/M26 junctions in the Wrotham area. The A226 runs east-west closer to the river but through existing urban development. In the Ebbsfleet area only the A226 and the A2 link through to Dartford. The A227 Wrotham Road forms a north-south spine. The A2 is regularly congested in the morning peaks due to traffic merging at the junctions and the loss of the 4th lane through Bean junction.

6.10. Any new development is therefore loading onto a transport system that is already at or near capacity. The demands on the system will increase from the contribution that Local Planning Authorities to the east are likely to add as a result of their Local Plans having to accommodate their own objectively assessed needs for homes and jobs (e.g. Medway needs up to 37,000 new dwellings 2012-2035 on the MHCLG figures).

6.11. Transport modelling exercises are being carried out at present in relation to the Lower Thames Crossing and the London Resort proposals. Information from these, which take account of committed and allocated development, will be used to guide future technical work on site selection. For this reason and the fluidity of the potential options, the Borough Council has not done any detailed transport appraisal at this stage. It is clear that this is a major area of concern to the Council and local residents.

6.12. For individual sites there is the question of access onto the local highway network to provide access. The access to public transport is important, with buses being flexible as to routing (but need sufficient demand), whilst railways can be regarded as fixed. Higham, Meopham and Sole Street have stations, which makes them more sustainable locations.

6.13. Para 32 of the NPPF says ‘development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe’. Given the issues outlined above, the problems of accommodating Gravesham’s required development represent a severe test to the transport system.

Education

6.14. The school system in Gravesham is already under pressure from existing population growth. New primary schools have been proposed at Springhead, St George’s School and Northfleet Embankment East (Rosherville). Culverstone Green Primary School is being rebuilt on site and such proposals exist for Chantry. There is also a stated need by the County Council for a new secondary school, which would require some 8 ha, for which there is no obvious site of that scale within the existing urban area or inset village confines.
6.15. New potential development areas will need to take into account the state of the local schools and what additional provision needs to be made. This might be in the form of a new school, expansion of existing school or possibly a total rebuild.

Healthcare

6.16. Darent Valley Hospital provides an Accident & Emergency department for the wider area and a range other services, with referral to hospitals in Medway, Maidstone or London for specialist services. Gravesham Community Hospital provides a GP run Minor Injuries unit and various other local services.

6.17. GP surgeries are increasingly being concentrated in larger units, for example the Fleet Health Campus in Northfleet. There are therefore future demands on the health system from the overall scale of development across Gravesham and Dartford, as well as more local requirements which will depend on the precise location of new development.

6.18. The Clinical Commissioning Group is developing an estates strategy so that it can identify the buildings needed to deliver its 5-year plan.

Utilities

6.19. Generally, utility networks can be extended or connected into, but there are certain limitations. Water supply is an important issue, but extra demand is balanced with measures to make more efficient use of it. Installation of such measures is easier in new build than retrofitting property. Waste Water Treatment Works (WWTW) will have a maximum capacity and exceeding that may require significant investment. Northfleet WWTW serves the west of the urban area (including Ebbsfleet) and rural area south of the A2, Gravesend WWTW serves the rest of the urban area, whilst the Higham area drains to Whitewall Creek WWTW in Strood.

6.20. A working assumption is that most issues can be overcome given sufficient investment but it may be that there are some fundamental constraints due to the scale of investment required. Utility providers also need certainty that development will be delivered. Discussions will therefore be held with the utility providers when these can be focussed on specific sites rather than generalised proposals.

Community Facilities

6.21. There are a number of other services that may need additional facilities, for example those provided by KCC Social Services. Other example would include churches and village halls. Again, there is a need to understand the location of new development as well as the changes that are occurring in overall population structure.
Green Infrastructure

6.22. Development should provide for green infrastructure both in terms of open space and landscape as appropriate. This may include enhancing nature conservation areas. Ebbsfleet is being promoted as a ‘garden’ city, which implies a strong emphasis on landscape and quality open space.
7. Seeking sites

Summary

7.1. The foregoing chapters can be summarised as follows:

- The existing Core Strategy provides for:
  - 6,170 homes
  - 4,840 B Class jobs
  - 24,390 m² (gross) retail floorspace

- The updated technical work suggests that these figures should be revised as follows:
  - 7,905 homes (8,035 on the Government’s methodology)
  - 2,290 jobs from the analysis but 4,840 would remain the target due to the small scale of Gravesham’s current economy
  - 22,500 m² (gross) retail floorspace

- The recent Government consultation on a standardised development needs methodology, which included indicative district-level figures, suggests that the above new housing figures are in the correct order of magnitude, which implies a substantial ramp up in the required housing land supply and its delivery

- Difficult to identify new land supply in the urban area as existing sites have been developed or are very challenging

- It is therefore necessary to look at a wider area

- There are major environmental constraints

- There are significant uncertainties over service provision particularly in relation to transport

What are the opportunities?

7.2. Gravesham’s strategic priority is to maximise the provision of development land within the existing urban area and within the confines of the villages inset from the Green Belt. Work is ongoing on looking to see how sites in the urban area can be brought forward. Redevelopment of brownfield land will remain a key objective, but it has to be acknowledged that the supply of this is diminishing on current evidence. If it is confirmed that this is insufficient to meet needs, taking deliverability into account, it will be necessary to look at rural land currently in the Green Belt. As already noted this is also subject to a host of environmental constraints.

7.3. Site provision is not simply about numbers but also about suitability, availability and achievability. A site in theory could, say, deliver high density flats, but if there is no reasonable
prospect of this happening within the Plan period that option cannot be taken into account. In this the Council is balancing overall delivery and the need to maintain a 5-year land supply, which requires a higher degree of certainty in the early part of the plan period.

7.4. Circumstances are changing all the time, so a key component in implementing the Plan is to monitor progress and respond accordingly.

Urban area and inset villages

7.5. Within the Northfleet/Gravesend urban area and the villages inset from the Green Belt most large sites have already been identified either in the Core Strategy Opportunity Areas (figure 7.1) or because they have planning permission. Whilst additional sites may come forward as major windfalls due, for example, to the unexpected closure of a major business, this cannot be foreseen. A recent trend has been the conversion of office buildings in Gravesend to residential use, now possible in certain circumstances without planning permission. However, there are few of these opportunities left and they are an important source of local employment, so this source cannot be relied upon into the future. Further potential sources of land are currently other employment sites, open spaces, car parks and the potential redevelopment of existing housing areas.

Figure 7.1 Core Strategy Opportunity Areas and Key sites

7.6. Some of these potential sources of land may be greenfield sites (undeveloped) or brownfield (previously developed). As noted above the Council's objective is the
redevelopment of brownfield land. Most of the sites in the urban area are brownfield but current
greenfield sites earmarked for development include land north of Coldharbour Road, land at
North East Gravesend and Springhead.

7.7. The Borough Council has been actively looking at its own land ownership, and as a result
some 50 new Council houses have been built or are planned. The Borough Council intends to
continue this programme.

7.8. The Open Space study has shown that the level of provision of various types of space
across the urban area falls below national standards. Overall, existing open space is needed to
provide play space, playing fields and green areas and to promote biodiversity. That said there
may well be some scope for reconfiguration of some of these open spaces, but this needs to
be examined in detail and account taken of local open space needs. Much open space, for
example children’s play areas, needs to be located close to the demand.

7.9. A number of former employment sites are already going to be redeveloped for mixed
employment and housing uses, for example Northfleet Embankment West and Northfleet
Embankment East. The Borough has the smallest economy in Kent, so employment land is
precious to retain local jobs and cut down the need to travel. It is also necessary to provide for
a variety of business uses.

7.10. A key variable for the local economy will be the number of jobs coming forward from
Ebbsfleet (whether in Gravesham or not) and the London Resort proposal. This is unknown
and uncertain at this stage, so the Plan can only monitor what happens, and adjust accordingly.

7.11. The Council is also examining the long term capacity of the car parks in and around the
Town Centre, whether public or private, for development opportunities. At present the supply
of car parking spaces meets demand from shoppers, local workers, commuters and residents.
West Street, Horn Yard and Market Square car parks are covered by the Heritage Quarter
development proposals. Lord Street is only in temporary use as a car park (and site office) so
its development in the future is taken as a given.

7.12. There is no simple answer to the question of how much car parking is needed in the
town centre in the future. It depends on the level of demand, which in turn relates to the future
structure and operation of Gravesend Town Centre as a retail and service destination, and its
supporting transport network. Multi-storey car parks are very expensive to build and run, so
raise site viability issues.

7.13. The car park sites with potential for development not otherwise accounted for are
Parrock Street and Milton Place. The Borough Council is exploring options involving both their
retention and their redevelopment. The Thamesgate and St George’s multi-storey car parks are
owned and operated by the respective shopping centres. The Gurdwara car park is operated,
but not owned, by the Council during the week, but not available at weekends.
7.14. Gravesend Town Centre has excellent accessibility and public transport provision but additional development implies additional traffic and there is an Air Quality Management Area around the town centre one-way system. It has a unique character from its historic features and riverside location, which make up an important part of its attractiveness and some of the rural settlements also have an historic importance. Consequently, there are constraints to development resulting from the need to conserve these historic areas and protect their listed buildings and conservation areas.

7.15. The Borough Council owns a substantial amount of housing stock, so another possible option could be to demolish existing residential property in the urban area and redevelop at higher density as was undertaken at Christianfields Estate, Gravesend. In that case the driver was the physical state of the buildings and the process yielded a net increment of 198 homes. The Right-to-Buy means that site assembly of any large site is likely to require the potential use of Compulsory Purchase Order powers and the remaining stock is already at a reasonable density.

7.16. The Council will continue to explore options for development or redevelopment in the urban area. On the current evidence it is not possible to say that the level of need can be met from within the urban area or from villages inset from the Green Belt.

7.17. The Government’s consultation on revisions to the NPPF says that the planning strategy should, amongst other things, optimise ‘the density of development, including whether policies promote a significant up lift in minimum density standards in town and city centres, and other locations well served by public transport’ (draft para.136). The existing Core Strategy as noted above seeks to maximise development in the urban area and inset villages subject to some constraints like keeping employment land, car parking standards and open space provision etc. To explore this further in the Gravesham context one of the options set out below looks at whether there is scope for significantly increasing density by means of changing existing Core Strategy policies.

**Green Belt**

7.18. The Green Belt is not an environmental constraint – it is about separation between, and the character of settlements. (see figure 7.2). The five purposes of the Green Belt as set out in Para. 80 of the NPPF are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
Figure 7.2 Gravesham Green Belt
7.19. The principal function of the Green Belt in Gravesham is to separate built development between settlements but on a larger scale separate London from the Medway Towns. As it is the first point where the Green Belt swings round the eastern boundary of the built-up area from the south to the Thames this separation function is of primary importance. In addition, it has more localised functions in relation to countryside and village protection.

7.20. The Borough Council has conducted a number of studies to look at the possible scope for development of land that is currently in the Green Belt. These do not amount to a full Green Belt Review, but provide an information base to help inform the debate. In particular at this stage detailed boundaries have not been addressed, and this includes some of the matters raised at the Core Strategy examination. These will be explored further in the next phase of the work. Note that if land were removed from the Green Belt it would no longer be protected by that policy, but all other relevant Local Plan policies would still apply. It is also possible to phase land for development over time, so redrawing boundaries does not necessarily mean immediate development.

7.21. The draft SLAA process requires that the ‘suitability’ of land for development be considered in ‘Policy on’ and ‘Policy off’ modes. National planning guidance advises that ‘An important part of the desktop review, however, is to test the appropriateness of other previously defined constraints, rather than simply accepting them’ (Planning Practice Guidance: Housing and economic land availability assessment para 11)\(^{13}\). The Borough therefore has to consider amending, amongst other things, the Green Belt boundary.

7.22. There is a choice as to whether development should consist of one or two large land releases or a series of smaller ones. As already noted larger developments are able to support necessary infrastructure of all sorts, but smaller sites are generally quicker to deliver. This will need to be examined further with the relevant stakeholders when any future decisions are made.

7.23. As noted there are a series of major constraints to development resulting from the presence of international and national nature protection sites, national landscape designations and areas of high flood risk. These are explained in more detail in section 5. 19% of the Borough’s land area falls within urban Gravesend/Northfleet. In the rural area 53% can be removed from further strategic consideration for the above environmental reasons. For the purposes of this report, these areas are referred to as absolute constraints in figure 7.3. This leaves 28% of the Borough as the primary area of search.

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Figure 7.3 Primary constraints
7.24. A study\textsuperscript{14} has divided the current Green Belt into 27 parcels of land to look at how they perform against the five purposes which the Green Belt serves. All the parcels at that level meet at least some of the criteria, some more so than others. There is therefore a case for keeping openness and separation between settlements, but that has to be balanced against other factors.

7.25. The landscape study\textsuperscript{15} has done a similar exercise to look at the landscape implications of development. Clearly at a basic level any new development is an intrusion in the landscape. The result highlights that some parcels are less sensitive than others but that large buildings (high rise or large employment structures) are likely to be intrusive in all parcels.

7.26. A separate report\textsuperscript{16} has looked at the constraints around the settlements. The broad conclusion is that there are no obvious areas where the Green Belt is not performing its function, but there are a host of other factors to be taken into account. This will be done as part of the on-going boundary review. Ultimately Green Belt land release will depend on whether exceptional circumstances are sufficiently strong enough to outweigh Green Belt restraint and if so, where could development take place? The following section sets out a number of possible options for growth but we would welcome your views on any other possibilities.

**Options for Growth**

7.27 Six potential development options follow, as the basis for debate on which views are being sought. Options 2 to 6 are based on those set out in a report entitled Discussion Paper on the Strategic Options for Growth in Gravesham Borough which was presented to Cabinet in 2014 \textsuperscript{17}. (See Figure 7.4) These took into account a settlement hierarchy which categorised settlements according to their size and the range of services and facilities available and hence their sustainability. This is now included in the Gravesham Local Plan Core Strategy.

7.28 Option 1 has been added in response to the Government’s proposed amendments to the National Planning Policy Framework, published in March 2018 (see paragraph 7.17).

\textsuperscript{14} Gravesham Green Belt Study, 2018
\textsuperscript{15} Landscape Sensitivity and Capacity Study, 2017
\textsuperscript{16} Broad locations Assessment, 2017
\textsuperscript{17} https://democracy.gravesham.gov.uk/ieListDocuments.aspx?CId=149&MId=2033&Ver=4
6 distinct options have been identified as follows:

- Urban 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 freestanding new settlement.
7.30 The 2014 report concluded that there was no obvious location within the Borough for a freestanding new settlement and this remains the view of the Council. However, the option has been retained in order to seek out the views of the public on whether a suitable site could be identified, through the consultation process.

7.31 Each option is capable of modification and some, but not all, possible modifications are set out in the text. However, at this stage, it is not considered necessary to develop any of the modifications. It is possible that a combination of different options/modifications could emerge from the consultation process and views are sought on these.

7.32 No specific sites are included so the capacity of each option cannot be established. Consequently, it is unknown whether any single option could provide sufficient land to fully meet Gravesham's development needs.

7.33 A number of factors are common to options 2 to 6 as follows:

- Continuation 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 of protection including AONBs Kent Downs Sites of Special Scientific Interest, Special Protection Areas, the Special Area of Conservation and the Ramsar;
- Encroachment into the countryside;
- Impact on the highway network;
- Impact on public services;
- Loss of agricultural land irrespective of whether it is currently being farmed.

7.34 Unlike options 2 and 6, Option 1 maximises development in the urban area and the village inset from the Green Belt. It does not encroach into the countryside, release land from the Green Belt for development or result in the loss of agricultural land. It shares in common other factors set out in paragraph 7.33. Whilst high rise development is ruled out for options 2 to 6, taller buildings are a possibility in option 1. However it implies the loss of some open space, public car parks and on-site parking provision.

7.35 It should be noted that where higher density development is raised as a possibility, it does not include high rise development. Policy CS15 of the Core Strategy makes it absolutely clear that all new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. The same will apply to all other land use developments.

7.36 Although included in option 4, Cobham is unsuitable for substantial growth due to its location in the Kent Downs Area of Outstanding Natural Beauty and any development would be minimal. Vigo is also located in the AONB but land outside the AONB adjoins the settlement, giving more scope for consideration within the options.
Figure 7.5 Settlements Overview
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 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 large 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 health
- Meet demand for smaller homes
- Over supplying small homes may not meet wider housing needs
- Loss of local employment / businesses could increase out-commuting
Figure 7.6 Option 1: Settlement Intensification
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 Bypass (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.
Figure 7.7 Option 2: Urban Expansion

Option 2: Urban Expansion

- Option 2
- Borough Boundary
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 services 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.
Figure 7.8: Option 3 Expansion of Tier 2 Settlements

Option 3: Expansion of Tier 2 Settlements

Option 3

Borough Boundary
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 third and fourth 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.
Figure 7.9: Option 4 Expansion of 2nd, 3rd and 4th Tier Settlements
Option 5: The 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 is an extensive area of plotland which has been developed in a piecemeal fashion. Its infrastructure is poor, requiring the rebuilding of roads and new water, electricity and sewerage provision to bring it up to modern standards. It 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 the 2028 target is met.
Figure 7.10 Option 5: The Creation of a Single New Settlement Through the Merger of Existing Settlements
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 some 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.

Gypsy and Travellers Accommodation

7.35. The Council also needs to identify sites for pitches to accommodate Gypsy and Travellers. The Core Strategy identified a need for 16 pitches to 2028, of which 5 have been provided to date. This is based on the 2013 Gravesham Traveller Accommodation Assessment. The Government updated its guidance in 2015, including changing the definition, making it more restrictive. Further guidance from Government is expected.

7.36. The Council has commissioned jointly with Medway Council a fresh Assessment to inform the current scale of need. This will need to take into account changes noted above as well as other legislation such as the Human Rights Act 1998 and the Equality Act 2010. The Housing Act 1985 was amended in 2016 to place a duty on Local Authorities to consider ‘the provision of sites on which caravans and houseboats can be stationed’.

7.37. Government guidance makes it clear that any sites for gypsies and travellers are inappropriate development in the Green Belt. If there is need for additional sites which cannot be accommodated in the urban area or inset villages, it will be necessary to consider whether a case for exceptional circumstances could be made to justify the release of land currently in the Green Belt, either as part of a larger housing site or on a much smaller local scale.

7.38. The results of the new assessment and any changes in Government guidance will inform the next stage of consultation.
Figure 7.11 Option 6: Creation of a Freestanding Settlement
8. **Next Steps**

8.1. The Borough Council will consider responses to the consultation and chart a way forward. This will involve additional technical work as well as discussions with relevant neighbouring Local Planning authorities and service providers under the duty to co-operate. Landowners and developers have made proposals which, where there is potential, will need to be further discussed. This consultation may well bring forward additional proposals to those already identified in the draft SLAA.

8.2. Technical work will include:

- Completing a full Green Belt Review
- Appraisal of the capacity and economics of developing sites (urban and rural)
- Updating assumptions underlying housing, employment and retail needs to check robustness
- Whole Plan viability – including the implications for the transport network
- Strategic Assessment / Strategic Environmental Assessment / Habitats Regulation Assessment / Equal Opportunities Assessment Equalities assessment
- Understanding the implications as far as possible of major developments such as Lower Thames Crossing and the London Resort.
- Taking on board any changes in the statistical or legislative backgrounds that may impact on the process

8.3. The Part 2 Development Management Policies consultation contains specific proposed text and policy wording. It also notes some possible minor changes to the Core Strategy to provide consistency.

8.4. This part of the consultation is about principles at this stage, but after considering all representations, the following changes may need to be considered at the next stage

- A possible change in the fundamental strategy of the Local Plan, which is currently set out in Policy CS02 of the Core Strategy
- Incorporation of the settlement hierarchy (probably into Policy CS02)
- Revisions to the quantities in CS02 and tables 3, 4, 5 and 6
- Any knock-on effects to other polices and the supporting text
Issues and Options Glossary

**AMR Annual Monitoring Report:** An annual report that assesses progress of the Local Plan preparation against the published Local Development Scheme (LDS), as well as demonstrating that the Duty to Co-operate is being met in the preparation of the local plan documents and satisfactory progress is being maintained in the implementation of local plan policies.

**AONB Area of Outstanding Natural Beauty:** A nationally important landscape designated under the National Parks and Access to the Countryside Act 1949.

**AQMA Air Quality Management Area:** An area designated by local authorities because it is not likely to achieve national air quality objectives by the relevant deadline.

**CIL Community Infrastructure Levy:** A levy allowing local authorities to raise funds for the provision of infrastructure from owners or developers of land undertaking new building projects in their area.

**Comparison Floorspace:** Retail floorspace for the sale of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods. Sometimes called non-food floorspace.

**Convenience Floorspace:** Retail floorspace for the sale of everyday essential items, including food, drinks, newspapers/magazines and confectionary. Sometimes called food floorspace.

**Core Strategy Opportunity Areas:** Areas identified in the Gravesham Local Plan Core Strategy showing where most change in the Borough will occur over the plan period. They establish a broad framework within which development can take place and an overall vision can be realised.

**Development Management Authority:** The relevant body responsible for the operation of development management with regard to the determination of planning applications. Locally, the relevant bodies are Gravesham Council, Kent County Council (Minerals and Waste) and the Ebbsfleet Development Corporation (in its area).

**Duty to Cooperate:** The duty to co-operate requires local authorities to work together on strategic matters that span local authority boundaries. Such matters can include infrastructure provision such as highways, utilities and health but also include matters such as housing, employment and retail needs.

**ELNA Employment Land Needs Assessment:** An objective assessment of future quantitative and qualitative needs for land and floorspace for economic development during the plan period.
**Equalities Assessment:** An assessment to ensure that local plan policies and proposals do not discriminate against disadvantaged or vulnerable people.

**FTE Full Time Equivalent:** An estimate of a full time job consisting of an aggregation of the hours worked in a number of part time jobs which equal the time worked in a full time job.

**Gravesham Gateway:** Located in the Civic Centre, it offers a meet and greet reception area, customer waiting areas, payment kiosks, meeting rooms, toilets, changing facilities, café and internet facilities. It also provides access to the Woodville Halls Theatre and the Blake Gallery

**GVA Gross Value Added:** The measure of the value of goods and services produced in an area, industry or sector of an economy.

**HRA Habitats Regulation Assessment:** An assessment of the impacts of policies and proposals on sites of international importance for wildlife, i.e. Ramsar Sites, Special Protection Areas and Special Areas of Conservation.

**HP Household Projections:** Produced by the Office for National Statistics, they indicate the number of households which would form if recent demographic trends continued. They are informed by assumptions on future levels of fertility, mortality, net migration and household formation behaviour.

**HS1 High Speed 1:** The country’s first high speed railway line running from St. Pancras Station to the Channel Tunnel and beyond (originally CTRL – Channel Tunnel Rail Link).

**HMA Housing Market Area:** A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be that housing market areas overlap. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries.

**Inset Villages:** Settlements surrounded by the Green Belt but excluded from it.

**LED Light Emitting Diode:** A two-lead semiconductor light source.

**MYE Mid-Year Estimates:** Annual estimates, produced by the Office for National Statistics in between censuses, of population sizes by age and sex, of the local authorities, counties, regions and countries of the UK. They take into account births, deaths and both international and internal migration.

**North Kent Enterprise Zone:** A designated area consisting of six sites within Ebbsfleet, Medway and Maidstone, where the Government offers incentives such as tax concessions to encourage business investment.
**NKL North Kent Line:** The railway line running from London via Gravesend and Medway Towns along the north Kent Coast to Thanet.

**NOx Nitrogen Oxide:** NOx gases (nitric oxide and nitrogen dioxide) are usually produced from the reaction among nitrogen and oxygen during combustion of fuels, such as hydrocarbons, in air; especially at high temperatures, such as occur in car engines. In areas of high motor vehicle traffic, such as in large cities, the nitrogen oxides emitted can be a significant source of air pollution.

**NPPF National Planning Policy Framework:** This 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.

**OAN Objectively Assessed Need:** The scale and mix of housing and the range of tenures that are likely to be needed in the housing market area over the plan period. The amount of need is based on facts and unbiased evidence. Constraints such as the availability of land, historic under-performance, viability, infrastructure or environmental constraints cannot be applied to the overall assessment.

**PEIR Preliminary Environmental Information Report:** A report required by Environmental Impact Assessment Regulations, when an application is made for a Nationally Significant Infrastructure Project, which will enable the local community to understand the environmental effects of the proposed development, so as to inform their response to it.

**PDL Previously Developed Land:** Land which is or was occupied by a permanent structure, including its curtilage, and any fixed surface infrastructure. It excludes land that is occupied by agricultural or forestry buildings; land used for mineral extraction or waste disposal by landfill where provision has been made for restoration; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and previously developed land where structural remnants have blended into the landscape over time.

**Ramsar Site:** An internationally important wildlife site under the Convention on Wetlands of International Importance especially as Waterfowl Habitat

**Settlement Hierarchy:** The categorisation of settlements in accordance with the level of services and facilities available to identify which are most sustainable.

**SAC Special Area of Conservation:** An internationally important wildlife site. Areas given special protection under the European Union’s Habitat Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations, 2010.
**SEA Strategic Environmental Assessment:** A procedure set out in the Environmental Assessment of Plans and Programmes Regulations, 2004, which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

**SHENA Strategic Housing and Economic Needs Assessment:** A report which combines an objective assessment of housing, employment and retail land and site requirements in Gravesham during the plan period.

**SHMA Strategic Housing Market Assessment:** An assessment of the housing market area, carried out with adjoining authorities, 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.

**SLAA Strategic Land Availability Assessment:** An assessment to identify sites that are available or could become available within Gravesham up to 2028, which are suitable for housing, employment and retail development. This covers the requirement to produce a Strategic Housing Land Availability Assessment (SHLAA) in the NPPF.

**SME Small and Medium Enterprises:** Enterprises defined by the European Union as those which employ fewer than 250 persons and which have an annual turnover not exceeding 50 million euro, and/or an annual balance sheet total not exceeding 43 million euro.

**SPA Special Protection Area:** An internationally important wildlife site. An area which has been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within the European Union countries. They are European designated sites, classified under the Birds Directive.

**Strategic Road Network:** Nationally significant roads used for the distribution of goods and services, and a network for the travelling public. In legal terms, it can be defined as those roads which are the responsibility of the Secretary of State for Transport and managed by the Highways Agency.

**SSSI Site of Special Scientific Interest:** A nationally important wildlife/geological site designated under the Wildlife and Countryside Act 1981.

**Sub-National Household Projections:** The household figures for England and its local authority districts derived by the Ministry for Housing, Communities and Local Government from the household projections model using sub-national population figures from the Office for National Statistics (ONS).

**SA Sustainability Appraisal:** An assessment of the environmental, economic and social impact of policies, to ensure that all policies and proposals reflect sustainable development principles.
**Thames Estuary 2050 Commission:** Established by the Government in 2016, it is preparing a vision and delivery plan for North Kent, South Essex and East London which will focus on creating internationally competitive centres of excellence, making the most of planned investments such as the Lower Thames Crossing, attracting and retaining skilled workers and working with organisations and communities to deliver the vision.

**TE2100 Thames Estuary 2100 Plan:** The Environment Agency’s plan, published in 2012 in response to the potential impact of climate change, for tidal flood risk management for London and the Thames Estuary through to the end of the century and beyond.

**Traveller Accommodation Assessment:** An assessment of the accommodation needs of Gypsies and Travellers which informs the level of pitch provision required over the plan period.

**UPC Un-attributable Population Change:** Unexplained differences between census data and inter-census population estimates.

**Use Classes:** A classification of land uses for development control purposes defined by the Town and Country Planning (Use Classes Order), 1987 and subsequent amendment orders. Changes of use of buildings or other land between uses within a single use class, are excluded from the definition of development in the Town and Country Planning Act, 1990, thus making planning permission unnecessary.

**Viability Testing:** The process of testing the overall deliverability of sites in Gravesham based upon type, location, land values, building costs and profit margins as part of the Strategic Housing and Economic Needs Assessment.