

FAQs: Gravesham Local Plan Site Allocations and Development Management Policies Document (April 2018)

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

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Local Plan Questionnaire

There were mistakes in the original Local Plan Review Questionnaire as originally circulated to all addresses in the Borough. We apologise for these mistakes and have taken the following measures to ensure they have no impact on your response:

- The questionnaire on our website – www.gravesham.gov.uk/yoursay - has been updated.
- You can email planning.consult@gravesham.gov.uk with your name and address and a new printed questionnaire will be posted to you (copies will be posted from Wednesday 2 May 2018).
- Copies of the revised questionnaire will be available at each of the drop-in sessions listed at www.gravesham.gov.uk/yoursay and at the Civic Centre in Gravesend from Wednesday 2 May 2018.
- You can still complete the questionnaire. You can also mark your exact views on the questionnaire, if you wish to do so, as follows.
 1. Question three - on the second column a scaling option was incorrect. The second option read 'agree' where it should have read 'important'. You could cross out 'agree' and write in 'important'. However the visual scale is correct and in validation we will be logging these responses as 'important'
 2. Question six, you could cross out 'not at all important' to indicate you mean 'strongly disagree' – as the symbol does represent 'strongly disagree'
 3. Question eleven – cross out 2-3 years and write in 2-5 years of this timeframe is applicable to you
- If you have already sent in your questionnaire, your views will still be counted and we have a process for evaluation in place. If you wish to complete a new questionnaire you may also do this.

The Development Plan

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

The document consists of two parts:

- Site Allocations – looking at the scale of new development needed and land for future development
- Development Management Policies – detailed policies for dealing with issues that arise from planning applications

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

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

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

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

3. Why do we have to have plan for more development?

It has been accepted by Government that there is a national housing crisis.

Equally it is recognised that the housing supply crisis is complex and has no single cause, but one important prerequisite for solving it is to find enough land for building.

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

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

Our development needs have increased from when the Core Strategy was adopted. The Government requires a Local Plan to aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole.

4. Why are you including Development Management policies?

We currently have some development management policies saved from the 1994 Gravesham Local Plan 1st Review. These need to be replaced or brought up to date and made consistent with the Core Strategy and the National Planning Policy Framework.

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

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

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

In due course, Stage 2 of the review will consider detailed land parcels and boundaries against a range of other factors. For clarity, detailed Green Belt boundaries cannot and should not be identified until the level of development, likely densities, sustainable

development considerations and land take is known and until other elements of the evidence base have been completed. It is at this detailed boundary stage that existing anomalies and boundary strength can be considered.

Soundness of the Plan

6. Can Gravesham adopt an unsound Plan (for example one that does not make full provision for its housing needs)?

Legislation is very clear (section 23 of Planning and Compulsory Purchase Act 2004) that if a Planning Inspector recommends non-adoption (with or without major modifications) the Planning Authority cannot adopt a Plan. The Government has also been taking a pro-active approach with Local Planning Authorities who have not got up to date Plans.

The Consultation

7. Why are you consulting on these documents?

The Council in the Core Strategy undertook to look again at the development quantities and Green Belt boundaries. Some technical work has been carried out on these topics and it is now appropriate to consult on the results. The Council has also asked land owners and developers to submit potential sites for development, which have been reviewed as part of the Strategic Land Availability Assessment (SLAA). The inclusion of a site in the SLAA does not imply any acceptance of it by the Council. Until a site has planning permission or forms part of an allocated site in the development plan, a site has no planning status.

8. How are you going to consult me?

We are carrying out a consultation for 8 weeks between [25 April 2018] and [24 June 2018]. A summary document which includes a questionnaire with questions to understand your support for growth and the nature and location of that growth including all the growth options has been sent to every residential and business address in the Borough.

9. Does my opinion count and how can I respond?

We want as many people as possible to join in the debate about the future growth of Gravesham and we will listen to everyone who contributes to the consultation.

The summary document has been produced with a Freepost form so no stamp is required. This questionnaire asks for some information about the responder but you don't need to provide your full address and name unless you want your comments to be attributed to you and for us to contact you about the progress of the Local Plan.

There are two ways of responding – via the online form, or by posting your paper forms back to us.

Once the consultation goes live, the easiest way to make comments on the Plan will be online via the Council's website. Public IT equipment is available in the Gravesham Gateway for anyone who doesn't have access to the internet. The website address is: <http://localplan.gravesham.gov.uk/consult.ti/system/listConsultations?type=all>

Some more detailed and technical questions are also asked in the documents themselves. We are happy to receive answers to either or both types of question.

All the information is available online at www.gravesham.gov.uk/yoursay . Hard copies of the draft Plan are available for inspection at libraries and the Civic Centre.

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

As indicated in our response to the above question, as we are at an early stage of the process were we want as many people to comment as possible, we are not requiring personal information to be included on the questionnaire.

As the plan develops it is a national requirement that comments are 'duly made' i.e. they are received in a written format with a name and address supplied. Comments made verbally or anonymously cannot be accepted at these later stages.

Comments or 'representations' will not be taken into consideration or published if they contain anything that is considered racist, defamatory or derogatory.

11. Is it true that standard letters are not counted?

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

- **Petitions** – can be a useful way to highlight a particular viewpoint. The Council will require petitions to include names and addresses. By signing the petition, people are agreeing that we can log that they have commented. People may want to consider setting up an e-petition and the Council provides this facility via its website.
- **Standard letters** – can be helpful when a more detailed response is wanted that can be shared with like-minded individuals. These don't need to be personalised to count, rather we just need a name and valid address

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

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

If you want to find out more about the consultation and discuss the plans with an officer please visit one of the six drop-in sessions:

Date	Time	Location
Tuesday 1 May 2018	2-8pm	Eastgate Centre 141 Springhead Parkway Northfleet Gravesend Kent DA11 8AD

Thursday 3 May 2018	2-8pm	The Blake Gallery Civic Centre Windmill Street Gravesend Kent DA12 1AU
Saturday 5 May 2018	10am-4pm	Culverstone Community Hall Culverstone Community Centre Whitepost Lane Culverstone Green Meopham Kent DA13 0TN
Thursday 10 May 2018	2-8pm	Higham Memorial Hall School Lane Higham Kent ME3 7JL
Tuesday 15 May 2018	2-8pm	Chinnery Court Wrotham Road Meopham Kent DA13 0JT
Thursday 17 May 2018	2-8pm	Memorial Hall Lewis Rd Istead Rise Kent DA13 9JQ

13. What happens when the consultation period ends?

Once the consultation period ends, all comments will be made available for the public to see. Any personal details (apart from your name) will remain confidential. The comments, together with further technical work, will help the Council to arrive at a refined option for growth and in preparing draft proposals for the Site Allocations stage and further consultation will be undertaken in 2019.

Terminology

14. What is a Strategic Land Availability Assessment?

The Strategic Land Availability Assessment is an assessment of land to identify sites that are available or could become available within Gravesham up to 2028, which are suitable for housing, employment and retail development.

15. What is the National Planning Policy Framework?

The National Planning Policy Framework 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.

16. How is National Planning Policy changing?

The Government in the spring of 2016 produced a White Paper (Fixing our Broken Housing Market) and subsequently a further consultation (Planning for the right homes in the right places). Key features being proposed include:

- A formula for producing objectively assessed need
- Strengthening of the duty to co-operate process
- Changes to the National Planning Policy Framework

17. What is Objectively Assessed Need?

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

18. What is the Duty to Cooperate?

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

Initial discussions have taken place with the Dartford and Medway councils to this end, but they first need to see the evidence of Gravesham's attempts to meet its own needs and fully understand the implications of such an agreement for themselves before further discussions are progressed.

19. What is previously developed land?

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

Housing

20. What is a Housing Market Area?

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

21. How does the council decide how many homes are needed?

The process we have to go through is to determine Gravesham's Objectively Assessed Need (OAN), which is included in a Strategic Housing Market Assessment (SHMA) document. The Council has prepared this jointly with Medway as part of a broader Strategic Housing & Employment Needs Assessment for their respective areas. The SHMA contains nine scenarios showing annual household and dwelling growth up to 2037, based upon different assumptions regarding, for example, migration and economic activity. An annual need for 495 dwellings has emerged from this process.

22. What is a Strategic Housing Market Assessment?

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

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

The council has been making excellent progress in reducing the number of vacant properties in the borough in recent years, and we continue to work with partners to reduce the number of empty properties.

The Government's monitor of new housing only looks at net new dwellings.

24. Who will be moving into these houses?

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

Development Strategy

25. Are you changing your development Strategy?

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

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

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

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

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

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

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

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

The second avenue is the use of compulsory purchase powers. However, this is a costly and time consuming process and rarely used at a time of spending cuts in the public sector. The Government is aware of the problem of “land banking” by developers and in the November, 2017 budget, the Chancellor announced an urgent review of the gap between planning permissions granted and houses constructed. The Council is hoping that some practical, affordable remedies will emerge from the review.

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

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

This issue has been debated at length at a parliamentary level for many years. In 2016, MPs on the Communities and local government select committee said that:

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

The Governments response to this national issue is awaited.

Green Belt

29. Isn't the Green Belt an environmental designation?

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

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

30. Why are the Green Belt boundaries being reviewed?

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

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

When the existing development areas, brownfield sites and regeneration sites are taken into account, there is a shortfall of land to accommodate about 2,000 dwellings up to 2028. With only a limited supply of sites available within the urban area and settlements inset from the Green Belt, the Council has to investigate whether some development could be accommodated on greenfield and green belt land to make up the shortfall. It should be noted that major development sites within the urban area, such as land at Coldharbour Road, Ebbsfleet (Gravesham), Northfleet Embankment, Canal Basin, Heritage Quarter and North East Gravesend, are all factored into our existing supply.

32. What is 'not in appropriate' development in the Green Belt?

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

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

The NPPF allows for development to take place in the Green Belt in two ways. As explained in the question above, certain forms of development are not inappropriate in Green Belt. National policy also allows development to be approved except in 'very special circumstances'. This is a challenge case to make as 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness,

and any other harm, is clearly outweighed by other considerations. In both cases no changes are made to Green Belt boundaries and the sites remain in the Green Belt.

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

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

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

Viability

34. What is Viability Testing?

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

35. How do you know that your viability work is right?

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

Site Appraisal

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

At this stage the Council has only sought to undertake a high level appraisal of sites promoted to it and broad locations identified in 2014. Further work will be needed to ascertain which option for future development will be pursued and which, if any, of the sites set out in the SLAA would enable that option to be implemented and would therefore be suitable for inclusion as potential allocations in the Site Allocations and Development Management document. The Council is proposing to undertake this work

after the Stage 1 consultation ends, and the findings of this work will form part of the Stage 2 consultation in mid 2019.

Infrastructure

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

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

38. What about traffic?

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

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

Biodiversity

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

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

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

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

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

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

Employment

40. What provision is being made for employment?

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

Town Centre

41. What is proposed for Gravesend town centre?

We recognise the important role of Gravesend Town Centre to the Borough. The Council is maintaining its vision and policy for the town centre. The strategy envisages that the key regeneration project sites in the Heritage Quarter and the Transport Quarter will be developed for shops, restaurants, offices, parking and homes. In addition, the Council's Economic Development team is working on proposals to enhance the town centre's night time economy and leisure offering.

Ebbsfleet

42. Given the development of Ebbsfleet, why is further development necessary?

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

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

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

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

Gypsies and Travellers

44. What is happening about Gypsies and Travellers?

We will be considering the need for gypsy and traveller sites and setting targets for these. We have commissioned a new Gypsy and Travellers Accommodation Needs Assessment with Medway and will be consulting on the results of this work next year.

Culverstone

45. Will the Culverstone Valley Area be developed?

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