

## **Kent County Council Response to Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 - Stage 2) Consultation**

### **Question 1: What services and infrastructure would you want to see delivered to meet the needs of an expanding population and an ageing population, and where?**

For the Local Plan Partial Review to be successful in meeting the needs of an expanding and ageing population, allocated sites will need to be planned and designed to provide a diverse range of services. This will need to include all infrastructure and service provision that the County Council is responsible for - the County Council supports an “Infrastructure First” approach to development to ensure that infrastructure is planned, funded and delivered at the right time and ahead of residential development where necessary. New communities will need to be resilient to future challenges, including climate and ecological emergency and business continuity risks. It will also be important for growth to be increasingly zero carbon, and the Local Plan should seek to enable and promote the adoption of zero carbon behaviours.

The County Council encourages the importance of the Local Plan review process to focus on a place-making approach that puts infrastructure first. This will ensure that planned residential and commercial growth will deliver high quality and sustainable developments and provide opportunities for local people. This “Infrastructure First” approach is embedded in the Kent and Medway Infrastructure Proposition, a deal with Government for new infrastructure investment that will enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future.

Commitment to close collaboration between key partners will be essential to ensure that growth is planned, funded and delivered in a timely manner. The County Council will look to continue to work closely with the Borough Council to ensure that full infrastructure funding is available to enable the delivery of the necessary infrastructure to support new development at the right time.

**Highways and Transportation:** The County Council, as Local Highway Authority, would request that opportunities are made available for sustainable transport across the Borough. It is so important for public transport facilities to be factored into growth scenarios, to cater for existing and future residents – particularly as the increasingly older population may be more reliant on public transport to access key services and for social interaction.

It is imperative that the Borough Council continues to build upon the proposed improvements to public transport facilities (such as the Garrick Street hub and improvements to Rathmore Road) and walking and cycling infrastructure (such as the new cycle route between the town centre and the cyclopark). Highways and transport improvements should maximise opportunities for sustainable travel and reduce the impacts on the local highway network.

**Public Rights of Way (PRoW):** A convenient, accessible and reliable transport network will be vital for new development to be successful in meeting an expanding population. Providing infrastructure that encourages a modal transport shift towards walking and cycling should be an important consideration in planning for growth. Active travel considerations will help to reduce vehicle congestion on roads, alleviate air quality issues and improve health and well-being.

**Provision and Delivery of County Council Community Services:** Community facilities will need to be planned and delivered to ensure residents are able to access local services as required – to include the range of KCC provided services. The location and multifunctionality

of community services is best considered from the outset to assist in the delivery of sustainable and robust communities.

The provision of KCC's Community Services will be integral to the delivery of sustainable communities – and, through collaboration with the County Council, the Local Plan must therefore fully factor this into its growth strategy – to include how and when the necessary infrastructure and services be delivered as part of growth and to ensure that adequate funding for this provision will be provided via developer contributions. The following KCC services will all need to be factored into planning for meeting the needs of a growing population:

- As the Local Education Authority, the County Council has a duty to ensure provision of sufficient primary and secondary pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011. The Local Plan must ensure that the growth strategy factors in the delivery of and funding for sufficient pupil places at the right time and in the right location (question 28 provides further information on education pressures and requirements).
- The County Council is also responsible for ensuring the provision for Community Learning (formerly known as adult education) and Early Help for young people (from birth to 25 years old). Early Help duties include the delivery and commissioning of children's centre services, other specialist children's services and youth services.
- KCC has a duty to ensure early years childcare provision in Kent, as set out in the Childcare Acts 2006 and 2016.
- The County Council has adult social care responsibilities delivered through the Kent Accommodation Strategy for Adult Social Care to ensure adequate facilities for older persons in the County (KCC's response to question 8 in particular sets out factors that will need to be captured in the Local Plan).
- The County Council is the statutory library authority responsible for providing a comprehensive and efficient library service for everyone working, living or studying in the area (KCC's response to question 27 sets out specific considerations and pressures relating to library provision that will need to be captured in the Local Plan)

**Public Health and Prevention:** The provision of community meeting spaces in suitable settings for community groups (such as youth groups) as well as community development work (such as addressing health inequalities via the wider determinants of health e.g. Healthy Living Centres) will be important. Access to active travel and open access to green and blue spaces will be important factors for improving both mental and physical health, with consideration to be given to lighting and other facilities to encourage the use of public spaces. Ideally there would be space for public health services to operate from. This might include consulting rooms for smoking cessation, larger rooms for health visiting services and space for outreach sexual health and other services.

**Broadband Connectivity:** Digital connectivity is of critical importance for the both local residents and for the local workforce, but it is recognised that there can be a visual impact from associated infrastructure. A balance will need to be struck to ensure the necessary digital infrastructure is available to those who live and work in Gravesham.

**Sustainable Urban Drainage Systems:** The County Council, as Lead Local Flood Authority, would like to see multifunctional blue and green infrastructure delivered that can offer a wealth of benefits and opportunities for the environment and communities.

**Sports and Recreation:** The County Council's [Active Lives research](#) shows that a person is far more likely to be inactive the older they get. The Chief Medical Officer defines an inactive person as someone who, over the course of a week, does not achieve a total of 30 moderate intensity equivalent minutes of physical activity. Only 18% of 16-34-year-olds are inactive, but this figure rises to 27% of 55-74-year-olds and 49% of over 75s. Those who are least active stand to benefit the most by getting active when it comes to their health and happiness.

The situation is exacerbated by an ageing population – so it is important to invest now to help change behaviours. Older people and people with long term health conditions are a primary demographic for Kent Sport and Sport England. Whilst getting active can be challenging, and lapsing and re-lapsing is common, there should not be an assumption that older adults cannot be active, so work is required to break down these stereotypes. Encouraging older adults to be more involved in sport and activity is crucial and will help ensure that the Sport England vision to ensure that everyone in England, regardless of age, background or ability, feels able to take part in sport or physical activity, is achieved across the Borough.

Given the responsibilities of the County Council for vital community services, KCC would welcome continued engagement with the Borough Council as growth options for the Borough are developed through the Local Plan process, to ensure that all infrastructure and services provided by the County Council are fully captured in the emerging Local Plan.

**Question 2: Do you agree with retaining the current Local Plan Core Strategy Vision? (Please explain your answer by providing additional detail where possible)**

The current Local Plan Core Strategy Vision focuses on (amongst other things) regenerating Gravesham into an area that offers a diverse range of housing and employment opportunities and which respects the built, historic and natural environment. The County Council has no objection to it being retained.

**Question 3: Do you agree with retaining the current Local Plan Core Strategy Strategic Objectives with minor amendments? (Please explain your answer by providing additional detail where possible)**

The County Council generally agrees with retaining the current Local Plan Core Strategy Strategic Objectives, with the minor proposed amendments relating to Ebbsfleet Central and town centres to reflect changes and progress since the Core Strategy was originally adopted.

**Question 4: What would you improve about the Borough as a place to live, work, shop and undertake leisure activities? (Please explain your answer by providing additional detail where possible)**

**Sports and recreation:** According to the latest Active Lives data 2019/20, which sets out the number of inactive adults (those doing less than 30 minutes activity a week), Gravesham is the worst performing local authority in Kent.

To improve the levels of activity in residents, it is important to improve access to leisure facilities. Local Plan should seek to ensure it enables physical activity– and ensure that there

are formal activity offers for people as well as opportunities for informal activity (cycling, walking, running outside of club structures). It is important to make access easy and part of daily routine.

**Question 5: Should the Local Plan Partial Review's housing requirement follow the Government's standard method formula, including taking into account unmet needs from neighbouring authorities?**

The County Council recognises that it is the role of the Borough Council in determining local housing requirements, working with neighbouring authorities through the duty to cooperate. KCC would like to be involved in establishing the housing requirement as a key provider of infrastructure and services.

**Question 6: If your answer is no, please set out why you think this and what different methodology should be used and why?**

N/A

**Question 7: The current Housing Market Area boundary (Figure 7) is based on recorded trends. Do you have any evidence to suggest that the Borough's Housing Market Area may have changed since the Strategic Housing and Economic Needs Assessment was undertaken? If you do, or if you disagree with the boundary set out in Figure 7 please state why and provide evidence to support an alternative boundary.**

No comments.

**Question 8: Should the Borough Council require developers to specifically meet the needs of specific groups such as the elderly? If the answer is yes, how would this be achieved?**

The Borough Council should have regard to the Kent Accommodation Strategy for Adult Social Care in determining housing options for adult social care clients, and to ensure that adequate facilities are provided for older persons are captured in Local Plan policy, as necessary.

There is less demand for residential care places for people with medium needs, as people are choosing to stay at home for longer or are selecting other housing options (such as Extra Care) to maximise their independence. However, there is still a requirement for care homes to be provided and they can work effectively with people with challenging dementia. The number of people living with dementia continues to rise, resulting in a need for care homes that can offer nursing level care, given that people are living longer and with more complex medical conditions. The County Council will look to work with the Borough Council to ensure adequate provision of this housing type is considered within the Local Plan. Within this context, developers should then be considering how to meet the needs of specific groups, including the elderly, as they plan development proposals.

The County Council would also draw attention to the need to ensure that there is suitable and sufficient sheltered housing provision across villages within the rural areas.

**Question 9: Would you like to see more first homes and homes for older people built across the whole of the Borough?**

**First Homes:** The County Council firmly believes that all Kent residents should have an opportunity to live in good quality affordable housing – whatever their stage of life. First Homes need to be considered as just one element of a wider assessment into local housing need, so that they can then be delivered as part of an informed, evidence based approach that identifies what tenures and types of homes are needed to support and develop balanced local communities and meet residents' needs. Otherwise, they could potentially limit provision (particularly where there is demonstrated need for a particular tenure) of other types of affordable housing for those with the greatest need.

The County Council is operating in an increasingly challenging environment, and its overriding concern as infrastructure provider is in ensuring that adequate levels of funding are provided from development to support new and existing communities – and that there will not be an overall impact on infrastructure funding resulting from the provision of First Homes.

**Homes for older people:** The Ministry of Housing, Communities and Local Government (MHCLG) identified in its guidance 'Housing for older and disabled people' (June 2019), that the need to provide housing for older and disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. It provides safe and convenient homes with suitable circulation space and suitable bathrooms and kitchens. In consideration of the County Council's statutory responsibilities around Social Care, KCC requests these dwellings are built to Building Reg Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupants' requirements.

The County Council would recommend that the Local Plan should include consideration of dementia friendly design requirements. Small design changes to housing and infrastructure can help someone living with dementia to be more independent, by providing a home and environment that is clearly defined, easy to navigate and feels safe.

Well-designed housing can have long term benefits, including meeting market demand in an area that has a lack of supply, and can also improve health and wellbeing opportunities for residents. High quality design should also be accessible, taking into account the varying needs of the evolving community – and should reference the new Kent Design Guide, which is due to launch in 2021.

**Question 10: Should the Borough Council be prescriptive in terms of the mix, size and type of housing that should be delivered in the Borough, or should Borough Council continue to provide flexibility to Developers so that they can respond to changing market demands and economic realities? If the answer is yes, how would this be achieved: a single mix, size and type requirement for all sites or a range of requirements for different categories of site?**

The County Council recognises the value that a prescriptive policy approach can have in setting out the mix, size and type of housing because it can help to ensure that the right type of houses are delivered over the plan period across the Borough. Such policy provision is useful for the County Council as it enables an element of forward planning in the nature and extent of KCC services that will be required, but also the potential level of funding through developer contributions that could be generated from the developments.

That said, it is also recognised that allowing a more flexible approach for developers to respond to market demands and economic realities may allow sites to come forward that might be challenging on viability grounds if a stringent housing mix policy is applied. KCC would request that, whichever option is chosen, it is done using a robust evidence base and review of housing needs across the Borough, and with due consideration of the need to enable infrastructure providers to deliver necessary infrastructure to support development.

**Question 11: Should the existing approach to density standards in the Borough be changed? If it should, what alternative approaches should be considered?**

The County Council recognises that allowing for higher density development in the urban area can be beneficial in enabling growth to be accommodated and directed into an area that has established services and infrastructure in place. However, it can also place a strain on existing infrastructure where there is not always the possibility of mitigation – and this must be avoided. Should the Borough Council look to change the approach to density standards, the County Council would request early engagement, to ensure that the approach will allow for all the necessary KCC infrastructure and service provision – including school spaces, community service provision and highway infrastructure.

Any approach that would allow for an increase in density will also need to be informed by design standards to ensure that a higher density does not compromise on the standards of homes delivered – this could also include space for home working.

The County Council requests that the Local Plan Partial Review makes reference to the emerging Kent Design Guide and its principles to encourage good practice in development. There should be design emphasis on reducing social isolation, as well as crime and fear of crime, through design of safe, inclusive and accessible public spaces and amenity for all.

**Question 12: Should higher density development be sought in close proximity to rural train stations (i.e. Higham, Meopham and Sole Street)?**

This could be a sustainable option, but it cannot be assumed that location to a train station will make higher density development sustainable. Higher density development, even close to rural train stations, could put further strain on the congested rural network where residents will need to access services that are either not accessible or unlikely to be accessed by rail - this will depend on the services operated and their frequency. This would have further negative impacts on air quality as a result.

**Question 13: Should the Borough Council continue to seek up to 30% of new homes as affordable housing in the urban area and up to 35% of new homes as affordable housing in the rural area? What evidence do you have to support your view?**

The County Council recognises that the demand for affordable homes is increasing. Affordable housing must be of high quality, in the right location and with the infrastructure to support residents to have a good quality of life. There must also be a range of types and tenures delivered to meet the needs of the community. The proportion of new affordable homes to be required by policy is something for the Borough Council to determine, but the County Council would request that consideration is given to ensure that the delivery of affordable housing does not compromise the level of infrastructure provided to support development – there must be a balance sought between such competing demands on the viability of a project.

The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent. The Select Committee report sets out a range of recommendations, many of which are for KCC to consider, and which would go some way to support the development of genuinely affordable housing for the people of Kent. The County Council will welcome continued engagement with key stakeholders, including the Borough Council.

**Question 14: Should the Core Strategy thresholds for the provision of affordable housing be changed? What evidence do you have to support your view?**

The County Council would again request that, if altered, any thresholds set will still allow for key infrastructure providers to deliver the necessary infrastructure via developer contributions to support development.

**Question 15: Should the Borough Council apply the existing affordable housing requirements to Built to Rent schemes?**

No comment.

**Question 16: Given the affordability issues in the Borough should a greater mix of sites be identified to boost supply and affordability. With land allocated to also deliver a proportion of the Borough's housing needs on smaller sites?**

The County Council's main observation is that when smaller sites come forward for housing, it can be more challenging to fund and deliver the range of services and infrastructure that may be required as a result. The County Council will welcome an opportunity to work with the Borough Council as the evidence base, site selection and viability process for individual sites is progressed to ensure that any policy changes in the mix and size of sites taken forward within the Local Plan Partial Review would not be to the detriment of infrastructure and service provision.

**Question 17a: How and where should the needs of Gypsy, Traveller and Travelling Showpeople be met in the Borough? For example, should provision be made as part of land allocated in the rural area for housing?**

The Local Plan sets out that the Gypsy and Traveller Accommodation Assessment identifies an increased need in the Borough for Traveller pitches (beyond that previously identified). At this stage, the consultation document does not state how this need would be met. The County Council would advise that any allocated Gypsy and Traveller sites will need to take into account of whether they are in locations that have good local connections (whether in urban or rural areas) and with careful consideration of their integration with existing communities. The County Council's Gypsy and Traveller Service would welcome further engagement on how the Local Plan will seek to meet the needs of the Gypsy, Traveller and Travelling Showpeople in the Borough.

**Question 17b: Do you agree with the methodology utilised for the recent GTAA and the household need identified? If you do not, please provide alternative evidence**

No comment.

**Question 17c: How should the need for travellers who do not meet the Planning Definition be met and those whose need could not be quantified i.e. unknown?**

No comment.

**Question 18: Should we continue the current approach to protecting existing employment areas? If not, what evidence do you have to support your view?**

The County Council agrees with the approach to protect existing employment areas to help ensure there are genuine and sustainable opportunities for employment within the Borough.

**Question 19: Should we be allocating more land to meet the Borough's employment needs and to attract greater investment to the Borough, to try to ensure that for every 16-64 year old resident in the Borough there is a job opportunity available?**

The County Council recognises that the Local Plan Partial Review seeks to increase the level of employment land in the Borough by fifteen hectares. The County Council notes that the Local Plan Partial Review acknowledges that there are a number of factors which will have an impact on the economy across the country moving forward. The Local Plan will have to be flexible and resilient to be able to adapt to the changing needs of employers as the full impacts of the COVID-19 pandemic and its impact on the local workforce become apparent.

There are likely to be changes in future working patterns as a result of COVID-19 and this will need to be considered alongside changing demands for employment space. The impact of COVID-19, both in the long and short term, should be considered within the Local Plan. Although the long-term impacts are unclear, there may be a shift in the demand for office spaces which could potentially be replaced with demand for shared workspaces and meeting spaces for Small to Medium Enterprises (SMEs), with further demands from entrepreneurs. Shared workspaces and accessible employment locations have the added benefit of reducing the level of commuting out of the local area. The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent.

Suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this sector of the local workforce and their ability to continue working.

The rural economy is changing, and the Local Plan should accommodate this sector as it evolves to meet current and future challenges. To develop a vibrant rural economy that is capable of delivering Net Zero, the Local Plan should support the rural economy in delivering and increasing productivity, employment opportunities and food security.

**Highways and transportation:** The Local Plan should seek to allocate employment sites that reflect future needs of employers, ensuring the promotion of a modal shift towards sustainable transport modes. Businesses, schools, health services and leisure provision all need the support of sustainable transport infrastructure. The County Council, as Local Highway Authority, would welcome further engagement with Gravesham Borough Council to ensure opportunities for sustainable transport are delivered alongside economic and employment growth. Boosting the levels of employment spaces that can be sustainably accessed will have a positive impact reducing the level of out commuting, as well as local congestion on the highway network. Increasing employment space within Gravesham may

encourage in-commuting from neighbouring towns, so it will be important to ensure that employment land is mainly focussed in the urban areas where good public transport services exist, especially between Gravesham and Dartford, to promote and encourage sustainable access, reducing the impact on the highway network.

The economic recovery from COVID-19 and the Local Plan partial review present an opportunity to provide support to the low carbon sector and boost energy efficiency measures. The Local Plan should seek to continue to identify ways to boost support for this sector, with consideration of the current skills gap, to ensure economic and employment benefits during and beyond the COVID-19 recovery.

**Question 20: What provisions should be made to promote micro and small businesses in the Borough and to encourage people to work from home?**

Given the recent requirement to work from home where possible, the County Council recommends a renewed consideration of the design of homes, which allow for safe and reasonable home working areas. The County Council would recommend that digital infrastructure – including gigabit capable broadband connections (e.g. full fibre) - is promoted as part of sustainable development because this will boost the resilience of the local workforce, allowing them to work flexibly and at home where necessary.

Flexible working opportunities should be offered to ensure spaces can adapt as small and micro businesses evolve. Spaces must be well designed, accessible and with digital infrastructure to ensure they can meet changing needs as required.

**Question 21: Should the Local Plan be making provision for greater and better paid job opportunities for all residents and especially lower paid female residents of the Borough?**

The County Council would agree that in planning for growth, there should be an expectation that it will help to ensure the provision of the full range of employment space and services to meet residents' needs. Employment space should be well connected to help existing and new residents access local jobs. There should be a range of employment opportunities available for all skills levels.

**Question 22: What measures should be undertaken to reduce levels of out commuting?**

There is a need to ensure that adequate digital infrastructure is made available to allow for home working, alongside ensuring that new homes should be designed to incorporate suitable home working spaces. By boosting the resilience of the workforce to carry out their roles at home, this will reduce the need to travel, which will have a knock on positive impact on reducing levels of congestion across the Borough during peak hours.

**Highways and Transportation:** As Local Highway Authority, the County Council considers that to reduce the levels of out of town commuting, the Local Plan should focus on creating high density activity in the town centre, providing opportunities for more people to walk or cycle. For people travelling further afield, the Local Plan should provide a variety of travel options, reducing the impact on the local highway network. High quality employment spaces in accessible locations have the benefit of reducing the levels of out commuting by retaining the workforce within the Borough, with spaces meeting the needs of businesses as well as employees.

**Question 23: Should the Borough Council continue to focus retail, leisure and recreation growth towards Gravesend Town Centre, are there any areas of the Borough in need of retail and leisure floorspace to support the local area and sustainability?**

The County Council considers that the provision of a mix of retail, leisure and recreation will be essential for the Town Centre to grow and thrive. The investments made in the St George's Shopping Centre, and the further investments outlined in paragraph 1.7.13 of the consultation document, are a really positive step in delivering on this aim.

**Question 24: In light of the Government's changes to the Use Class Order and Permitted Development Rights, should the retail core of Gravesend Town Centre be protected, or should it be diversified to encourage a greater range of uses?**

Ensuring that the town centre has the flexibility to meet changing demands and shopping patterns is likely to boost the resilience of the Town Centre in the long term. The County Council considers that it is likely that Gravesend Town Centre (along with all town centres) will need to evolve to meet the changing needs of the community and this may include long term changes resulting from a movement towards online retail, and short term shopping and behavioural changes resulting from the COVID-19 pandemic. The County Council would support an evidence-based approach, which captures current trends and behaviours, to determine what approach will be most appropriate to take for the Town Centre.

The County Council will be supportive of Town Centre options that meet the needs of the local community, with facilities which can be accessed sustainably, and would welcome the opportunity to work with the Borough Council to ensure that highway and transportation considerations are taken into account. In assessing any options for diversification in the Town Centre, consideration must be given to ensure all service and infrastructure needs are assessed early on. Community facilities, delivered as multifunctional spaces, are particularly well placed to adapt to meet the changing needs of the community. The County Council supports temporary uses which can provide meanwhile services as they are required, provided the use can operate sustainably.

Permitted development from office to residential development in town centres can sometimes lead to the development of poor quality housing, which does not have access to appropriate community infrastructure and services and results in the loss of employment space within town centres. The County Council would like to see the Local Plan Partial Review have consideration of office to residential permitted development, and how it can be appropriately managed to ensure sustainable growth and adequate employment space within the Borough.

**Question 25: Is the Borough Council's revised settlement hierarchy approach suitable? Please provide details.**

The County Council understands the revised settlement hierarchy generally reflects the Option B growth strategy presented in the consultation document – to which KCC provides its full comments in question 28

The County Council, as a key infrastructure provider, would reiterate that growth should be focused on areas with existing infrastructure, or where there are opportunities to expand infrastructure and services to support the growth. Within its response to the Regulation 18 Stage 1 consultation, the County Council provided comments on the various growth

strategies put forward and raised the importance of bringing forward adequate infrastructure to support development within the urban area.

The County Council acknowledges the need for expansion of the urban area, which could provide opportunities for sustainable transport and the scope to develop further community infrastructure. Growth in urban expansions can help to enable new residents and the new workforce to take advantage of existing high-quality facilities and infrastructure. Locating development in these locations reduces the need to travel, provides opportunities for a high sustainable mode share and in turn, reduces the impact on the local highway network. Within this consultation, urban expansion continues to feature at the top of the settlement hierarchy as the main area for growth in the Borough. The County Council notes that (under Option B) the proposal for urban expansion on land at Chapter Farm (to the west of Strood) for 1,385 dwellings remains, with expansion to the east of Gravesend is now reduced to a smaller number of sites.

Regulation 18 Stage 1 consultation also proposed the expansion of second tier settlements, including Istead Rise, Hook Green Meopham and Higham. The County Council notes that this consultation is looking (under Option B) to consider expansions around Higham (including Lower Higham), Meopham (including Hook Green and Meopham Green) and Istead Rise (all being proposed as “Large Villages” in the revised Settlement Hierarchy). The County Council acknowledges the need for expansion of these settlements to provide the critical mass to deliver the necessary infrastructure to support sustainable development.

The County Council previously raised concerns about including dispersed developments as part of the growth strategy, especially in the third and fourth tier settlements, due to their ability to deliver sustainable growth. The County Council is therefore pleased to see that medium and small villages are not the main focus for growth, but are instead recognised as being suitable for limited development and residential infill (for medium villages) or infill only (for small villages) only. The County Council would however request clarification on what ‘limited development’ entails – and would emphasise that it must be only small scale development that will not have any tangible or significant impact in respect of increased vehicle movements.

**Question 26: Are we right not to consider how the changes in technology impact of the sustainability of rural settlements? Or should we update how we assess settlement sustainability?**

Changes in technology and behaviours could have an impact on the sustainability of settlements, as well as behavioural changes that have taken place in response to the COVID-19 pandemic. The role that technology has played in enabling a shift to work at home, the rise of online shopping and online leisure activities could be important in assessing how technology has, and could, shape settlement sustainability.

Changes in technology and behaviour also apply to travel and it should be recognised that the younger generation in particular is shifting towards using more sustainable modes of travel and engaging in a sharing economy (such as public transport, car share, Uber and car clubs). There would be a need for significant levels of infrastructure across rural settlements to support this level of technology, as well as investment, to deliver this. Moreover, there is still likely to be a reliance on private vehicles within rural settlements, regardless of any such advancements, which would have a cumulative impact on the network, particularly in congested areas and rural areas where the existing carriageways may not be suitable for increased levels of traffic.

**Question 27: Should the housing requirement for the Borough be broken down so we can understand the specific individual housing need requirements for the urban area, parishes and Istead Rise?**

It is understood that this question relates to whether an alternative approach could be to meet housing need for specific areas within the Borough rather than for the Borough as a whole. The County Council defers to the Borough Council on the suitability of this approach. As an infrastructure provider, the County Council is concerned with the delivery of sustainable development supported by adequate infrastructure. Therefore, the County Council would be keen to engage with the Borough Council further if this approach is to be progressed to ensure that the specific housing requirements identified, can be supported by relevant infrastructure.

**Question 28: Which redistribution approach do you consider to be the most effective (A, B, C or D)? Are there any alternative approaches that should be considered?**

KCC notes that the four growth options put forward under this consultation look to deliver the growth required beyond that already set out in the Local Plan Core Strategy. As a key infrastructure provider, the main consideration for KCC in considering these four options is to ensure that any selected growth strategy will enable growth to be supported by the necessary infrastructure, at the right time.

Any infrastructure improvements or new facilities and services required as a result of growth within the Borough must be wholly funded through developer contributions. It will be essential for the funding mechanisms required for infrastructure requirements to be established at the outset, and this must underpin the assessment of growth options, to ensure that prospective site allocations are genuinely viable and deliverable. The County Council would welcome discussions with the Borough Council on the chosen growth strategy at the earliest opportunity to ensure the necessary infrastructure is planned for, funded and delivered in a timely manner and ahead of residential growth where required.

The County Council generally favours growth strategies that include sustainable larger development sites, as they are more capable of supporting new infrastructure. When a more dispersed growth strategy is proposed, it is often more challenging to ensure that the right community facilities are brought forward to support these smaller development sites. However, KCC notes that the consultation document indicates that a location for a freestanding settlement has not been identified. KCC notes that reference is made in the document to the only reasonable location (being to the east of Istead Rise and north of Meopham) is not being progressed due to landscape and Green Belt impacts.

It is also noted land to the east of Gravesend has been removed, as the land is unlikely to be available under this plan period, due to it being required for the construction of the Lower Thames Crossing and mitigation once the crossing is opened. The County Council notes, however, that the land between Thong Lane and the alignment for the Lower Thames Crossing will be safeguarded for development beyond 2030 and for a future Local Plan.

If the Development Consent Order is granted for the Lower Thames Crossing, it is likely to have a significant impact on the surrounding communities - both during the construction and operational phases of development. There will be notable impacts on the existing highway network as well as environmental impacts (including air quality) resulting from the development. The County Council is engaged with Highways England and the Planning Inspectorate on this scheme and has requested that further environmental information is provided to fully understand the environmental impacts, stressing the need for this piece of infrastructure to be fit for the future.

The challenge of balancing the pressure of growth against the impacts on the environment and health is now more important than ever before. Road transport emissions are a significant source of both carbon emissions and the main cause for poor air quality across Kent and Medway. The County Council would therefore remain cautious regarding the impact in which the Lower Thames Crossing may have on the surrounding communities until further information has been provided by Highways England.

Any growth strategy for Gravesham should have consideration of the Kent and Medway Energy and Low Emissions Strategy (ELES). The ELES sets out how KCC in partnership with Medway Council and district authorities, will respond to the UK climate emergency and drive clean, resilient economic recovery across the county. Key priority actions, which should be considered within this Local Plan Review, include promoting the development of an affordable, clean and secure energy supply for the county, reducing greenhouse gas emissions, eliminating poor air quality and reducing fuel poverty.

The County Council, as Local Highway Authority, considers that each of the four options proposed provide opportunities, but also create challenges, for the delivery of necessary infrastructure to support sustainable travel opportunities. At present, 38% of the Borough's greenhouse gases arise from transport. It is therefore imperative that sustainable transport options are fully explored for any growth strategy in order for the targets set out under the Borough's Climate Emergency declaration to be realised – and they should also take into account the ELES. This includes the provision of walking, cycling and public transport facilities, as well as new technologies and innovations.

#### ***Option A: a proportionate distribution based on the scale of existing areas***

It is understood that Option A would proportionately distribute growth based on the scale of the existing housing stock in rural areas; this would range from Vigo taking 9% growth to Istead Rise taking 17% growth. Whilst this approach would direct most development to large rural settlements, which are likely to be better served by services and facilities, it does not take into account the range of other factors such as distance to jobs, facilities, location or public transport. There is concern that this option could therefore result in unsustainable growth and put pressure on existing services, reliance on the private car and pressure on existing roads as a result of growth in a number of settlements across the Borough. Taking quite a formulaic approach like this would make it more challenging to properly take into account spatial and locational considerations. This approach is also likely to lead to dispersed and piecemeal development, which is unlikely to deliver the infrastructure required to support growth.

#### ***Option B: Local Plan Core Strategy Partial Review and Site Allocations document allocations***

It is understood that Option B would distribute housing around Gravesham, at Chapter Farm (adjacent to Strood) and Large Villages at Istead Rise, Meopham (Hook Green and Meopham Green) and Higham (including Lower Higham).

**Highways and Transportation:** In terms of highway capacity, KCC recognises that there are areas in the Borough that will require highway improvements in order to mitigate the impacts of the developments. These areas will be identified through highway capacity modelling at the next stage of the Local Plan process, once the KCC model is available for use. It is recognised that parts of the Borough within the urban and rural areas suffer from congestion on the highway. This is a major concern for KCC and will need to be addressed.

Land at Chapter Farm (the large development site to the west of Strood) potentially benefits from good access to the A289 Wainscott bypass and onwards to the A2, as well as rail connections within Medway. KCC would recommend discussions take place with Medway Council as the neighbouring highway authority for this proposed site allocation.

All the sites located in the “Large Villages” category of the revised settlement hierarchy will need to be well connected to the existing transport network and where relevant, connected in transport terms to adjacent communities, avoiding isolated pockets. The capacity of the railway (both on the trains and on the platforms) should be assessed to ensure they can cater for the increased demand.

The proposals for larger pockets of development in the rural areas are in locations where bus services and sustainable connections to surrounding destinations are currently limited. Where there is public transport, it is not necessarily providing a service that can be relied upon in place of the private car, due to the infrequency of the bus service (i.e. one bus an hour/ limited evening services/ no buses on Sundays). Whilst the increased demand may in some areas bolster the existing rural bus services, the existing services are often infrequent and the quantum of development proposed may not be sufficient to provide the level of infrastructure required to support the new development.

Sites put forward in the Local Plan will need to have appropriate pedestrian, cycle and public transport access between them and key destinations in order to ensure sustainable travel is a viable option. The County Council draws attention to the fact that some of the sites may be located in areas where realistic walking and cycling distances are not achievable.

Dispersing development across these smaller settlements, which are a distance from the main urban area of Gravesend and beyond walking distances from services, would mean that cycle route and local bus services improvements would still be necessary to promote sustainable travel. The main concern is that if the critical mass to support investment in transport infrastructure is not reached, there would be a reliance on the private car for access to key services. Moreover, where train services are limited, such as in Meopham Station, this may result in residents choosing to travel by private vehicle to their destination, thereby increasing the use of unsustainable travel.

It will be essential to ensure that for any housing allocations located in the rural area, parking provision is factored into the masterplanning or site design of all schemes to prevent any inappropriate vehicle parking overspill into surrounding rural roads and villages. The County Council would welcome discussion on establishing the appropriate parking standards. Moreover, during construction phases for new developments, construction traffic and associated parking can have a negative impact on local rural communities if effective strategies are not agreed and implemented from the outset. It will be crucial for Construction Management Plans to be developed and agreed with the Local Highway Authority to establish suitable routes and mitigation to reduce the impacts of construction on local communities.

The Vigo/Culverstone Green area for growth put forward under the previous consultation was less favourable in transport terms. The County Council therefore welcomes the removal of that element.

**Education:** As Education Authority, the County Council notes that the overall housing requirement would indicate a need to create a new eight form entry secondary school and four new two form entry primary schools across the Borough. The delivery, funding and location for this provision will need to be planned for into the Local Plan growth strategy.

Fewer, but larger, developments would make the provision of new schools sustainably. There is some capacity in a few of the existing schools across Gravesham, including within the urban area, however, nearly all school expansion options have now been deployed. The wide dispersal and rurality of development spread across the Borough will result in the challenge of finding sites that are near enough to the developments to prevent a significant increase in road traffic due to children travelling to their schools.

**Provision and Delivery of County Council Community Services:** KCC generally supports the location of higher density development in the urban areas, as this will enable new residents to take advantage of existing high-quality infrastructure and will provide economies of scale sufficient to expand this infrastructure.

It will be important to factor in land availability for the provision of necessary infrastructure. The County Council anticipates that land availability could be especially difficult along the riverside and north of the M2 where land will be at a premium or simply unavailable. There must be suitable land available for the delivery of community infrastructure within close proximity to growth to ensure these facilities can be accessed sustainably.

The development of the site at Chapter Farm would result in a large proportion of residents using services and facilities in Strood and the Sustainability Appraisal confirms this. The County Council would therefore recommend early conversations with Medway Council to ensure that the necessary infrastructure capacity is factored in.

A benefit of expanding the second tier settlements of Istead Rise, Meopham (Hook Green and Meopham Green) and Higham (including Lower Higham) is that housing could potentially be delivered at a scale to enable some new infrastructure to be supported and would allow for greater use of rural bus services and struggling local services. It will be critical for there to be a realistic prospect to create or sustain infrastructure and services to meet demand, to avoid significant pressure on existing facilities and infrastructure.

### ***Option C: Improving settlement sustainability***

It is understood that this option would direct development towards settlements that are classed as less sustainable locations due to the limited provision of local services and employment opportunities. The intention would be to improve their sustainability through broadband – including 4G, new service provision and the use of virtual access to services and employment.

The Sustainability Appraisal sets out that the areas that would receive most growth under this option would be those in the lower two levels of the existing settlement hierarchy – including Cobham, Shorne, Sole Street, Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway and Three Crutches.

This option could improve and enhance services and reduce the need for people to travel to other settlements to access services. It is not clear how it would work in practice – particularly in respect of viability, as developments would potentially have to generate larger sums of money through developer contributions to deliver the additional infrastructure and services required. Moreover, often large-scale growth is required to fund the delivery of significant infrastructure improvements that would succeed in boosting the sustainability credentials of an area.

The County Council would therefore oppose this option – raising uncertainty as to whether such an option would deliver sustainable development (certainly in the immediate term) and could actually have the opposite effect, with a detrimental impact on congestion and private car use.

The County Council would urge the need for early engagement with the Borough Council if this option is to be progressed to further understand the aims and aspirations of this strategy, to allow KCC reasonable opportunity to respond with its thoughts on this approach.

***Option D: A mixture of the above***

It is not clear what this option would look like in practice i.e. its success would very much depend on the selected site allocation locations, how they are distributed and which elements of each of the three growth strategy options would be taken forward. The County Council would request a discussion at the earliest opportunity to discuss this in more depth, to understand the implications for funding and delivery of infrastructure and services that would be required if this option is taken forward.

**Question 29: Do you support the formation of Neighbourhood plans, should the council encourage their establishment by local communities? If yes should the council actively help with this?**

The County Council considers that Neighbourhood Plans are important in ensuring new development is rooted in local distinctiveness, and in offering opportunities for local residents to shape future development in their area and tailor it to local area circumstances and needs.

They also provide a very useful tool in allowing local people to be directly involved in the planning of the local area, driving suitable development whilst also gaining an appreciation of the balances in growth required to deliver sustainable development. They are often developed following extensive public consultation with the local community and provide comprehensive detail on a very local level.

As such, the County Council considers that, as the neighbourhood planning process can be time consuming and it can be costly to produce a sound Neighbourhood Plan (with the process largely dependent on the goodwill of volunteers), any support that the Borough Council is able to provide to encourage their establishment is likely to be valuable - as neighbourhood planning groups may require support to ensure their plans are effective, impactful and accessible.

**Question 30: Do you agree with these criteria? Are there any changes or additional criteria that you consider we should take into account?**

No comment.

**Question 31: Should the Council continue with the Local Plan Core Strategy's existing approach of ensuring existing settlements do not merge? If not, why?**

The County Council recognises that the adopted Core Strategy seeks to ensure that existing settlements do not merge. It is understood that the proposed site allocations, as presented in Figure 14, would result in some settlements in the rural area merging by creating clustered settlements across the larger villages of Hook Green, Meopham and Higham. This option could potentially add significant pressure on existing facilities and infrastructure, with limited prospect of being able to create or sustain new infrastructure to meet demand and so the County Council does not support this approach.

**Highways and Transportation:** Should this approach change as indicated in the consultation document, highway infrastructure will need to be provided between the selected locations in order to allow people to travel between them in a sustainable way and not be reliant on the private car. A lack of high-quality footways and a lack of cycle facilities in general is common in rural areas and needs to be addressed. There is concern that some areas will be located outside of reasonable walking distances. High quality and frequent bus services would need to be provided.

**Question 32: Do you have any views in relation to the sites identified in meeting the Borough's needs so far?**

**Transport Strategy:** KCC has undertaken work on a Strategic Outline Business Case for a potential overnight lorry park on KCC land adjacent to Gravesham Site GB07 "Former Tollgate Hotel" and would draw attention to paragraph 107 of the National Planning Policy Framework.

**Provision and Delivery of County Council Community Services:** The County Council notes that proposed allocated sites have been provided as appendices to the main consultation document. KCC would welcome early conversations to discuss the housing delivery trajectories once an emerging growth strategy is chosen and to plan for the need, funding and delivery of all necessary KCC infrastructure and services to ensure that growth in these areas sustainable.

## **Minerals and Waste**

### *Land-won Mineral safeguarding*

The County Council, as Minerals and Waste Planning Authority, notes that Figure 14 illustrates the sites that could contribute towards meeting the Borough's development (supported by appendices). The sites identified appear to not coincide with any safeguarded land-won minerals outside the recognised urban area (as shown on the adopted proposals map: Gravesham Borough Council - Mineral Safeguarding Map of the adopted Kent Minerals and Waste Local Plan (KMWLP)). Provided this is, and remains, the case, mineral safeguarding of land-won minerals will not be a material consideration for this Local Plan Partial Review as it proceeds through its regulatory consultative steps.

If additional sites come forward that are coincident with either River Terrace or Sub-Alluvial River Terrace Deposits and are outside the defined urban and settlement boundaries in the Borough, then Mineral Assessments will be required.

The Minerals Assessment will determine whether or not the allocation(s) would be exempt from the presumption to safeguard these mineral deposits from needless sterilisation (as set out in Policy CSM5: Land-won Mineral safeguarding of the adopted and recently partially reviewed KMWLP). The exemption criteria to be met are detailed in Policy DM7: Safeguarding Minerals Resources of the KMWLP. Such assessments would be part of the respective allocation's justificatory evidence base in the event that they are required and it would need to be demonstrated that an exemption is justified for the allocation to be part of a sound Plan.

### *Minerals and Waste Infrastructure Safeguarding*

The Borough has a number of safeguarded mineral importation (wharves) and waste management facilities that are safeguarded (see Policy CSW16: Safeguarding of Existing Waste Management Facilities of the KMWLP).

Figure 14 appears to indicate that none of the sites either directly conflict with, or come within 250m of, safeguarded sites. If additional sites are identified in the emerging Local Plan that do either directly conflict with the continued use of the site for mineral/waste management purposes or are within 250m of the safeguarded sites, then Infrastructure Assessments will be required.

The Assessments would need to determine whether or not the allocation(s) would be exempt from the presumption to safeguard. The exemption criteria and other material considerations to be met are detailed in Policy DM8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities of the KMWLP. Such assessments would be part of the respective allocation's justificatory evidence base in the event that they are required. They would have to demonstrate that an exemption is justified for the allocation to be part of a sound plan for submission to the Secretary of State for Examination.

Figure 11 sets out Local Plan Core Strategy Key Sites (employment, mixed use and residential). It is notable that there are a number of strategic mineral wharves in the general location of these sites. Accurate determination of boundaries and proximity of these sites against the safeguarded minerals and waste infrastructure is somewhat difficult to discern. If any of the sites are coincident with, or are within 250m of, any safeguarded wharves (Clubbs Marine Terminal, Old Sun Wharf, Red Lion Wharf, Wharf 42 [including Northfleet Cement Wharf] and Northfleet Wharf) then Infrastructure Assessments will be required. As set out above, the relevant tests for what sites would classify as being exempt from the safeguarding presumption and for what is acceptable are set out in Policy DM8 of the KMWLP.

The County Council notes that some of the strategic sites within the Core Strategy Partial Review may have been part of previous Local Plan consideration. Where sites are being carried forward into a partial review of the Plan, it does not exempt them from being considered against the presumption to safeguard the minerals and waste management infrastructure that they might affect. In the case of extant planning permissions on any of these Core Strategy sites, the relevant assessment may well have been carried out already and demonstrated that the development allocated for in broad principle may be acceptable. However, this does not remove the need to consider safeguarding matters again as part of the Local Plan's Partial Core Strategy and Site Allocation Review at this time.

**Heritage Conservation:** An assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record on the proposed site allocations. This is provided in Appendix 1. It is not a detailed appraisal, but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options, which will need to be undertaken as the Local Plan progresses.

### **Question 33: Are there any alternative approaches that the Council should consider?**

The County Council recognises the importance of this Local Plan Partial Review process to plan for future growth within Gravesham, with policies in place to ensure that growth is sustainable. Should other approaches be put forward for consideration under this Local Plan Partial Review consultation, the County Council requests continued working with the Borough Council, to enable full consideration of the potential implications and the range of infrastructure requirements to help ensure that a sustainable and deliverable housing strategy for Gravesham is progressed.

**Question 34: Should the Council be more specific in relation to defining the Open Spaces that are protected and be more specific regarding future provision?**

The County Council would suggest that there should be spaces protected for informal physical activity to support sustainable growth. These should be designed into any new development to ensure that new and existing communities have access to suitable open spaces for sports and recreation purposes.

The pandemic has highlighted that access to these spaces can have positive physical and mental health benefits and should be considered a key piece of infrastructure in the delivery of sustainable development.

The County Council recommends that future provision should be accessible by sustainable means, ideally walking and cycling. These should form part of a requirement for future provisions. The spaces should also be multifunctional, offering opportunities for a diverse range of uses so it can be the needs of all members of the community.

Multifunctionality should also extend to the implementation of sustainable drainage systems, which are often associated with delivery of open space. Assessing drainage in conjunction with other provisions such as biodiversity enhancements for new development, and any open space allocations, can mean that a more efficient design proposal is developed that can better accommodate housing requirements.

**Question 35: Should the Council designate local green spaces? Do you agree with the local green space criteria identified?**

Access to green and blue spaces for leisure can enhance mental health and give opportunities for physical activity, which improves both mental and physical health. Studies have shown that local green spaces provide considerable health and well-being benefits for the public, but the creation and preservation of this resource will come under increasing pressure from new development. With this in mind, the provision of high-quality open space and green infrastructure, which provide opportunities for outdoor leisure and recreation, are important infrastructure requirements that must not be neglected if new development is to be successful.

The provision of a well-connected network of green and blue infrastructure can also provide multiple benefits for health, climate change adaptation for both flood and heat and air quality benefits, whilst also possibly having economic benefits. This should be reflected in the Local Plan Partial Review across health, infrastructure and environmental themes.

The County Council supports designation of local green spaces to ensure this valuable resource is accessible to both new and existing communities.

**Question 36: Are there any additional sites that should be considered for local green space designation through the plan making process? If yes, please see Appendix 2 for further information on how to nominate a site.**

No comment.

**Question 37: What particular pressures do you experience in relation to existing infrastructure, please provide details such as type of infrastructure and location?**

The County Council provides vital community services that are experiencing increasing pressures and constraints as a result of growth across the County. Significant investment is needed to release these pressures. The County Council highlights a number of areas below where pressures are felt in relation to existing infrastructure.

**Highways and Transportation:** Sustainable transport must be integrated and delivered to support growth in the Borough. There is a lack of segregated cycle facilities across the Borough and in particular, a lack of high-quality pedestrian and cycle facilities in more rural areas, which would need to be improved. KCC will require appropriate improvements to these facilities to connect residents and employees with key destinations and reduce reliance on the private car.

Fastrack provides a high-quality bus service to the town centre, however, the rural areas have limited bus services. These will need to be improved to cater for new developments although there is concern over whether a critical mass will be available to achieve the required improvements.

The highway network is congested in a number of areas (such as Coldharbour, Milton Road) and there are limited opportunities to increase the capacity (due to lack of available highway land and economies of scale), especially if development is spread out across the Borough. No highway capacity modelling has been undertaken at this stage so KCC is unable to comment further but will look to work closely with the Borough Council as this is progressed.

KCC recognises that the Local Plan Partial Review has been prepared in light of the latest information from Highways England on the Lower Thames Crossing (LTC) project. LTC is a large-scale infrastructure project, which if granted permission by the Secretary of State, will have significant impacts on Gravesham, both in terms of traffic and wider environmental implications. KCC has commissioned a study of the traffic impacts of the LTC on the strategic and local road network, together with proposed mitigation measures. The County Council will continue to engage with Highways England and Gravesham as the LTC project progresses.

**Provision and Delivery of County Council Community Services:** There is already considerable pressure on all County Council community services to ensure they are able to meet the evolving needs of the growing population. The County Council, as community infrastructure provider, must continue to be engaged in the production of the Local Plan to ensure the necessary infrastructure is planned for and delivered at the right time to support existing and new communities.

When a small number of large developments are proposed, the approach to mitigating the impact of development is much clearer and more deliverable as it provides a strategic focus for the planning and delivery of KCC infrastructure services in an effective and timely manner. The County Council is therefore keen to engage with the Borough Council as the development strategy is prepared.

### *Libraries*

Library and registration services will be delivered from a network of buildings across the Borough. These will need to be accessible by good transport links to make a visit to a library (whether it is to borrow a book, use a public computer, find out information, register an important event or attend a social or learning activity) available to a high percentage of Gravesham residents. The locations of library buildings will develop to reflect changing demographics, working in partnership with other KCC and external partners to bring a range of services under one roof for an improved service offer and efficiency.

Physical library services will include outreach to smaller and more remote communities. For example, the mobile library service and home delivery to meet the needs of residents who may not be able to travel to a building location.

Physical services will be supported by a range of online and remote offers, for example registering a death by telephone, contacting the Ask a Kent Librarian team for information or borrowing e books and magazines. KCC's digital service offer will continue to develop, however, services that bring people together will continue to have an important part to play to help to tackle social isolation, digital exclusion and to promote community cohesion and health and well-being to people who live, work or visit Gravesham.

**Waste Management:** KCC, as the Waste Disposal Authority, is required to dispose of kerbside collected waste and also provide a service for householders to dispose of any additional waste brought directly to one of its centres.

The Pepperhill Waste Transfer Station and Household Waste Recycling Centre located at Station Road, Southfleet currently serves the Gravesham area. This facility is at capacity. In order to continue to provide a sustainable service, additional capacity needs to be provided in line with projections for Gravesham's expanding population, via developer contributions. KCC recommends that the Local Plan acknowledges the importance of this essential infrastructure and the demands on it generated from new housing.

**Public Health:** The County Council has public health responsibilities across Kent and is aware that how places are designed and built is crucial to creating a healthier, fairer and more sustainable society. Growth across the County offers a unique opportunity to build communities that actively promote positive health and wellbeing choices, thereby easing future pressures on health and other public services. For example, consideration can be given to the accessibility of schools via active transport and the availability of healthy food choices near schools. Growth can also be designed to be resilient to public health emergencies and offer, for example, opportunities for home working designed into new development.

Sustainable growth must address health and wellbeing for new and existing communities. This can be achieved not only considering healthcare and leisure infrastructure, but also by consideration of the wider determinants of health, such as access to green space, air quality and economic opportunity, and planning them into growth accordingly.

Infrastructure should be delivered to support the health and wellbeing of the Borough's residents and visitors, particularly through the wider determinants of health and ensure that the dispersal of new settlements and major extensions do not widen health inequalities between local communities. It should allow access to green and blue spaces for leisure – which would have positive effects on mental and physical health by providing opportunities for leisure and for physical activity.

In addition, growth will need to seek to improve air quality through all means; reduction in emissions from vehicles and buildings as well as access to cleaner forms of transport, including electric vehicles.

**Adult Social Care:** The Local Plan should have consideration of the KCC Adult Social Health Care and Health 'Your life, your wellbeing – A vision and strategy for adult social care 2018-2021'<sup>1</sup>. All development should support independence, be accessible and include 'extra care housing' that is flexible and responsive to the changing needs of individuals.

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<sup>1</sup> <https://www.kent.gov.uk/about-the-council/strategies-and-policies/adult-social-care-policies/your-life-your-wellbeing>

**Cultural Provision:** Culture contributes to placemaking by creating attractive, culturally vibrant and authentic places. It can build community bonds and cohesion, support individual health, wellbeing and resilience and foster civic identity and encourage stewardship. Cultural infrastructure should be in place to support growth, offering opportunities new and existing communities.

**Question 38: Do you agree with the Council's approach in working with infrastructure providers and other partners to ensure infrastructure is delivered to adequately meet the needs and mitigate the impacts of new development?**

Close working with infrastructure providers is essential in ensuring the right infrastructure is delivered alongside growth, at the right time. To deliver sustainable development, a collaborative approach with all key stakeholders is required to ensure that growth can be delivered sustainably taking in to account all necessary infrastructure and services required to deliver robust and resilient communities. The County Council would therefore welcome continued engagement as a key stakeholder.

In promoting an "Infrastructure First" approach to development, the County Council would emphasise the need for infrastructure to be planned for, funded and delivered in a timely manner, ahead of residential and commercial growth as appropriate. Early engagement is therefore required to ensure that the necessary infrastructure provision is considered alongside the timings for its delivery to ensure it is available as required to support sustainable development.

The County Council notes that KCC has been identified as a key stakeholder for health and transportation infrastructure. The County Council draws attention to all of its statutory and non-statutory functions. County Council responsibilities extend beyond health and transportation infrastructure in its roles as Lead Local Flood Authority, Education Planning Authority, Minerals and Waste Planning Authority.

**Question 39: Do you agree that the Council should be addressing the Climate Change emergency proactively? If not, why not and what are the risks involved in not taking suitable action at this stage?**

The Borough Council should be addressing the Climate Change emergency proactively. Working with key stakeholders, the Local Plan will need to ensure that there are robust policies in place to protect the natural environment and to bring forward proposals that can help address the challenges of climate change.

The County Council would recommend the adoption of the Kent and Medway Energy and Low Emissions Strategy, which sets a target to reduce emissions to Net Zero by 2050 at the latest. The County Council would also recommend that planning policies actively encourage low carbon innovation in new developments and support the continued expansion of low carbon jobs and skills in Kent.

Failure to tackle the UK climate emergency at this stage presents a significant long term risk to the Borough, as outlined in the Kent Climate Change Risk and Impact Assessment (CCRIa) report. The adaptation catalyst tool can help improve resilience planning for the future climate and should be used in the preparation of the Local Plan.<sup>2</sup> The County Council would welcome further engagement on this matter.

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<sup>2</sup> <https://publicwiki.deltares.nl/display/AP/Adaptation+Catalyst>

The Kent Design Guide, which is to be relaunched in 2021, contains a commitment to designing for sustainability. The County Council would recommend reference to this Guide within the Local Plan Review.

**Biodiversity:** The County Council would emphasise that a key factor in ensuring the best outcome for biodiversity is adherence to the mitigation hierarchy. This will help respond to the ecological crisis. It means developers must engage with this early on in the design of a development. Importantly, mandatory biodiversity net-gain is being introduced as the mitigation hierarchy alone is insufficient to prevent biodiversity loss. Ultimately, ensuring that ecologically beneficial designs are secured via the Local Plan will improve Gravesham's ecosystem services (complimenting paragraph 170 of the NPPF) and, for large developments, relieve the recreational pressure on designated sites/areas of conservation interest within the district.

The County Council has adopted the Biodiversity Strategy, which commits to setting out a five year implementation plan to sit alongside the strategy, with delivery of the targets broken down into smaller, shorter actions to progress towards the 25-year vision. The County Council would recommend that the Borough Council works closely with the Kent Nature Partnership so that the Local Plan can help embed and deliver the Strategy's ambitions to consider, protect and enhance Kent's valuable natural capital resource and the services it provides.

**Question 40: Should the Council make provision for large-scale renewable energy generation? The Borough has recognised wind resource, would you welcome wind turbines?**

The County Council supports the provision of large-scale renewable energy generation, in the right locations. All suitable sources should be considered, including small and large scale solar and district heating schemes. The County Council would welcome further discussions with the Borough Council on the provision of renewable energy sources.

**Question 41: Should the Council require new development to accord with an energy hierarchy, which in order of importance seeks to minimise energy demand, maximise energy efficiency, utilise renewable energy, utilise low carbon energy, and only then use other energy sources.**

The County Council fully supports the requirement that all new development must adhere to the energy hierarchy. Minimising energy demand will be essential if Net Zero targets are to be met. The County Council urges that the use of fossil fuels should be avoided.

**Question 42: Should strategic development allocations be required to make use of decentralised heating and cooling networks?**

KCC encourages all new developments to be built to low carbon standards and preferably Net-Zero where possible. Sustainability should be considered from the outset of the design of a new development. This should include consideration of the orientation of the building (such as south facing roofs), and consideration of technologies that could be incorporated into the building to provide renewable heat and electric.

The County Council encourages the use of decentralised heating and cooling networks, such as Combined Heat and Power (CHP) and district heat networks in strategic

developments, where there are assurances that the energy costs will remain affordable for users. The County Council would support the development of policies which require all developments to incorporate high levels of renewable and/or decentralised energy, such as solar PV and district heating, with this requirement identified early in the design stage to reduce costs.

The County Council would also recommend that developments should include high levels of insulation, but they should also be designed to prevent overheating, to ensure that homes are robust against the challenges presented by climate change.

It should be noted that from 2025, the Futures Home Standards will require that there no more gas or fossil fuelled new developments.

**Question 43: Should the Council require new developments to include a detailed carbon assessment to demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions, where appropriate?**

The County Council supports the use of carbon assessments in new developments. These assessments should consider emissions during construction and end of life phases, in addition to the emissions during use. This would be particularly valuable for large developments where the cumulative impact of carbon emission reduction measures will be greater felt.

**Question 44: Should the Council require developers to contribute towards increasing the area of habitats that sequester and store carbon, including through the provision of additional tree and shrub cover within the Borough?**

The County Council would support increases in habitats that sequester and store carbon, however, this would need to be carefully managed to ensure that the most suitable plant and tree species are planted in appropriate places. Furthermore, there must be provision and consideration for the long-term management of such areas. The Borough Council may wish to consider developing a carbon sequestration offset fund that developers contribute to, rather than require developers to provide the additional tree and shrub coverage within the development.

**Question 45: Should the Council seek to deliver net zero carbon development at a faster rate than allowed for by Government Building Regulations?**

The County Council would support the development of policies that require stricter carbon standards than current Building Regulations. KCC's latest analysis of Net Zero pathways for the county indicate that the Kent target will only be met if new homes have significantly lower energy demand and efficiency than current standards. The use of Passivhaus standards, or equivalent, are needed as across all new developments to meet Net Zero targets.