

By: Paul Crick
To: Deputy Leader of the Council
Subject: KCC's response to Gravesham Borough Council's consultation on their local plan Core Strategy 2011

Classification: Unrestricted

Reference : 11/

Summary:

This report updates progress with the Gravesham Core Strategy since KCC's comments on the options under consideration in January 2010. It recommends KCC's responses to the policies that are now the subject of public consultation (part 6). In particular, it is recommended that KCC supports a substantial reduction in the number of new dwellings compared to the South East Plan but objects to the release of Green Belt sites for housing in the rural area.

Recommendation:

The Deputy Leader of the Council is asked to agree the proposed responses by KCC highlighted in section 6 of this report, together with a schedule of detailed points.

1 Introduction

1.1 In January 2010, Gravesham Borough Council (GBC) consulted on their *Core Strategy and Development Management Policies* which set out how the Borough should develop to 2026. Since then the *Localism Act* has been passed which will revoke the South East Plan, the prospects for the economy and the housing market have faltered, and the Borough has undertaken new studies, including the viability of development sites.

1.2 The Borough Council therefore proposes a revised approach in the *Gravesham Growth Scenarios and Core Strategy* consultation of October 2011. This invites views on development options for Gravesham to 2031, and amendments to the policies published in 2010.

2 Relevant priority outcomes

2.1 The priority outcome for KCC is that the Borough Council should take full account of the implications for KCC service provision in their local plan. The Borough Council will consider the representations it receives and draft the Core Strategy to be considered at public Examination accordingly.

3 Financial Implications

3.1 The decisions to be taken by the Borough Council may have long term financial implications for KCC, depending on the mechanisms in place and the funding available in the future for infrastructure and service provision.

4 Legal Implications

4.1 Gravesham Borough Council is the responsible authority for the Local Development Framework and decisions on the scale and location of development. KCC provides information to the Borough Council as part of the evidence gathering that it must undertake to inform its decisions.

5 Background - Gravesham Growth Scenarios

South East Plan and National Policy Framework

5.1 The South East Plan protected the Metropolitan Green Belt from development and focused growth and regeneration in Kent Thameside on previously developed sites and the urban areas. The Borough Council's *Core Strategy Consultation* in January 2010 complied with the South East Plan which required the provision of 9,300 dwellings in Gravesham from 2006-2026, only 100 of which would be located to the south of the A2. The South East Plan also envisaged about 58,000 additional jobs in the Kent Thames Gateway, 10,000 of which the Borough Council sought to provide in Gravesham.

5.2 However, Gravesham believe that the response to their January 2010 consultation indicates that high density development within the urban area is no longer feasible due to changing economic circumstance and a downturn in the housing market. They believe this conclusion is supported by their draft *Strategic Land Availability Assessment* and their studies of the viability of development.

5.3 The draft *National Planning Policy Framework* requires the local plan to deliver sufficient housing, taking into account need, demand and choice. It should enable housing to be continuously delivered for at least 15 years from adoption, and provide a clear economic strategy.

Growth Scenarios

5.4 In the light of the revocation of the South East Plan and changes to national planning policy, the Borough Council has examined alternative growth scenarios. It commissioned KCC to forecast population, households and labour supply on alternative assumptions to 2031 as follows (*Demographic and Labour Supply Forecasts Technical Paper July 2011*):

- Long Term Migration (LTM) trend: 4,600 dwellings (230 per annum)
- Historic Building Rate : 4,700 dwellings (235 per annum)
- Zero Net Migration (ZNM) : 5,200 dwellings (260 per annum)
- Structure Plan Policy : 5,900 dwellings (295 per annum)
- South East Plan : 9,300 dwellings (465 per annum)
- South East Plan Option 1 : 9,900 dwellings (495 per annum)

5.5 The *Long Term Migration* scenario assumes a continuing small net out migration from Gravesham, much of which is movement within Kent, and the *Zero Net Migration* scenario brings in and out migration into balance. There is little

difference between these forecasts and they are similar to the past house building rate in Gravesham. With these forecasts new dwellings are required to meet the needs of households forming in the existing population, although it is not possible to control the occupation of new dwellings provided in the open market.

5.6 The scenarios based on the Kent and Medway Structure Plan and South East Plan are higher. Both plans were based on estimates of the scale of development that it would be possible to accommodate on urban regeneration sites, and they imply net in migration to Gravesham, notably from London.

5.7 The consultation document assumes that Gravesham’s preferred scenarios will require the provision of 4,600-5,200 dwellings from 2011-2031, with a target of 5,200 dwellings.

The Need for New Residential Land

5.8 The *Core Strategy* consultation is based on the October 2011 draft *Strategic Land Availability Assessment* (SLAA) which takes into account assessments of the viability of development based on 2010 dwelling values. The consultation describes this as a “*worst case scenario*” (para. 3.6) and states that the assessment of land available could change in the light of consultation with owners and developers (para. 3.8).

5.9 The viability assessment concludes that high density development results in the lowest residential land values, especially in the urban areas, because the value of flats has fallen fastest (paras. 3.9 and 3.10). Their draft *Strategic Land Availability Assessment* therefore changes the phasing of sites reduces their density or deletes them, and the Borough Council doubts whether a strategy reliant on regeneration sites can deliver a 5 or 15 year land supply (para. 3.12).

5.10 The Borough Council proposes an amendment to Policy 13 (residential development) to provide 4,600-5,200 dwellings from 2011-2031, with a target of 5,200 dwellings, and a need to identify new sites for 320 to 920 dwellings, derived as follows:

Table 1 : Need for new dwelling sites

	Dwellings
Dwelling need : Long Term Migration Trend / Zero Net Migration to 2031	4,600-5,200
Residential commitments to 31 March 2011	1,150
Commitments to 31 March 2011 subject to legal agreements	259
Sites in draft SLAA within Gravesend/ Northfleet/ Ebbsfleet	2,871
Total identified land supply	4,280
Dwellings for which land needs to be identified	320-920

Source : Based on Table 3 Consultation Document October 2011

5.11 The estimated shortfall of land for 320-920 dwellings is the result of the Borough Council’s reassessment of the capacity of major regeneration sites within

the Gravesend, Northfleet and Ebbsfleet urban area. The Borough Council now expects 2,856 dwellings to be delivered on the strategic sites, compared to 5,552 in the January 2010 consultation, and proposes that this revised assessment of site capacity is included in Core Strategy Policy 16, Table 7:

Table 2 Capacity of Strategic Sites 2010 and 2011

Strategic Site	Dwellings (Jan 2010)	Employment Floorspace sq m (Jan 2010)	Dwellings (Oct 2011)	Employment Floorspace sq m (Oct 2011)
Ebbsfleet	1,064	107,000	858	107,000
Swanscombe Peninsula	0	40,000 (B1-B8)	0	55,000
Northfleet Embankment West	910	850 (A1) 46,500 (B1, 2, 8)	710	47,000
Northfleet Embankment East	1,500	20,000 and 40,000 committed (B1,B2,B8)	150	54,000
Town Centre	810	42,330 (A1,A3, B1a,B2,B8)	488	46,580
Canal Basin	1,268	35,000 rationalising existing space	650	41,500
Total	5,552	330,830	2,856	351,080

Source: Based on Table 7 of the 2010 consultation and table 4 of the 2011 consultation.

5.12 The Borough Council's judgements on viability and the capacity of strategic regeneration sites underpin their case for new green field sites to accommodate 320-920 dwellings. However, the assessment of the viability of urban regeneration sites is recognised as a "worse case". The capacity of sites is the subject of continuing consultation with landowners and developers (para. 24.5) and it is recognised that they "may well not be correct" (para. 24.6).

6 KCC Response to Consultation

(i) The number of new dwellings

6.1 KCC supported a target of 9,300 dwellings for the period 2006-26 proposed by Gravesham in their 2010 Core Strategy consultation, in accordance with the South East Plan. KCC also supported the principle adopted by the South East Plan and the Kent and Medway Structure Plan that the number of new dwellings should be determined by the development accommodated on urban regeneration sites.

6.2 There is no question that the major regeneration sites within Gravesham will not accommodate the number of new dwellings envisaged at the time of the South East plan was prepared, and target lower than 9,300 dwellings is now appropriate. However, the Core Strategy should recognise that the number of new dwellings on the regeneration sites could be increased if market conditions change. There are green field sites outside the Green Belt that could accommodate much or all of the shortfall suggested by the Borough Council.

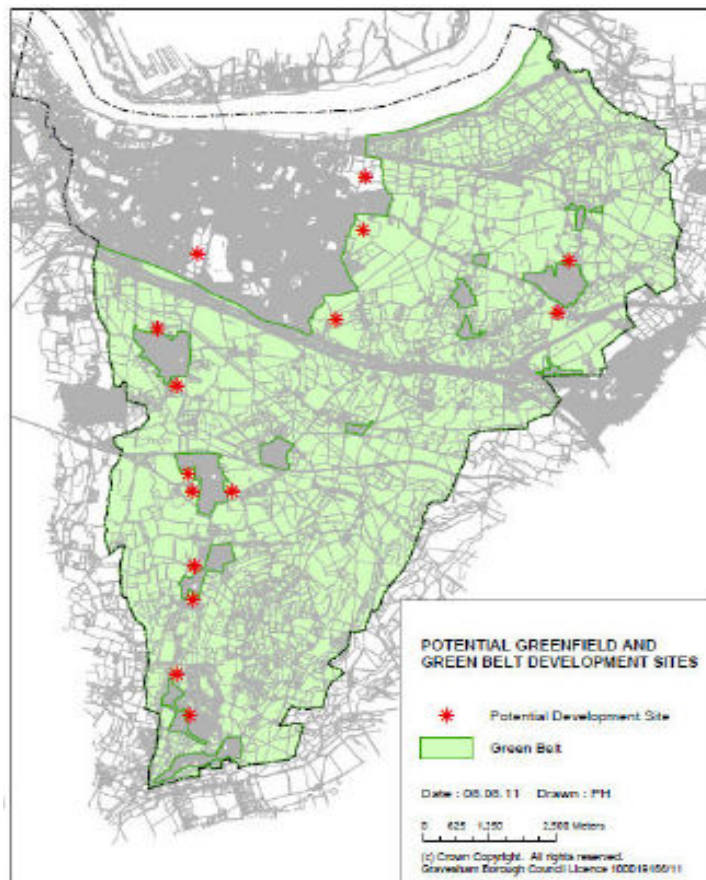
6.3 The County Council's forecasts suggest that 5,200 dwellings would balance in and out migration, but such forecasts are subject to change and are not intended to set development quantities.

6.4 **Questions 1 and 2** of the Consultation ask which scenario the Borough Council should progress and why. **It is recommended** that the Borough Council be informed that KCC could support their proposed target of 5,200 dwellings unless their continuing studies and changing circumstances demonstrate that a higher value can be accommodated within the urban area. KCC does not believe that the case has been for development on Green Belt sites has been made, and would **object** to such allocations.

(ii) Potential Greenfield and Green Belt Development Sites

6.5 The Borough Council believes there is a shortfall in deliverable, previously developed sites in the Gravesend, Northfleet and Ebbsfleet urban area, and that there is a need to consider other sites for 320-920 dwellings if the target of 5,200 dwellings is taken forward. Rather than looking at minor adjustments to the Green Belt boundary a *Greenfield and Green Belt Site Assessment*¹ has been made. The map below shows 15 potential sites, each large enough to accommodate 50 or more dwellings.

Potential Green Field and Green Belt Sites



¹ Greenfield and Green Belt Site Assessment and Options Paper (Aug 2011)

6.6 The Borough Council has not carried out a strategic review of the Green Belt and is not proposing to safeguard land between the urban area and the green belt which may be needed to meet longer-term development needs.

6.7 The site assessment concluded that land outside the Green Belt at North East Gravesend is unlikely to be suitable for residential development (para. 11.10) because most of it has a high probability of flooding, and there are potentially significant nature conservation issues. This site, plus other land along the re-aligned A2, is proposed to be taken into the Green Belt, providing approximately an additional 70ha. A site at Gads Hill was also ruled out

6.8 The remaining sites were assessed for their development potential based on the impact on the Green Belt boundary, access to services, and whether the sensitivity of the landscape. Further work will assess whether the sites can be delivered.

6.9 The consultation puts forward a choice of two methods for the selecting the sites to be allocated for development:

- Using the settlement hierarchy contained in Policy 1 as the main consideration or
- Using the overall site score as the main consideration.

Questions 7 and 8 in the consultation seek views on which of these methods is preferred, and if neither, what alternative should be used.

6.10 The Borough Council have assessed 13 sites, 11 of which are in the Green Belt. They have used a number of criteria, including “*impact on Green Belt boundary*” and “*sensitivity of landscape*”. This approach does not comply with long established planning policy for the Green Belt. The draft National Planning Policy Framework (NPPF) will be finalised in March 2012 and incorporates current policy in PPG2. The NPPF states (from paras. 133-143):

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Belt serves five purposes:

- *to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘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.”

6.11 Residential development other than minor infilling is “*inappropriate development*” in the Green Belt and ‘*very special circumstances*’ must be demonstrated to justify each case. The Borough Council has not justified seeking development sites within the Green Belt (para. above), but also has not assessed the potential sites having regard to the “*essential...openness and...permanence*” of the Green Belt, and the “*substantial weight*” that should be given to any harm that may caused to the Green Belt. This is evident from the scores derived for the 13 sites in the Borough Council’s assessment. For example, a site within the urban area and not in the Green Belt for an indicative 349 dwellings (West of Wrotham Road), and a site within the Green Belt on the edge of the village of Culverstone for 193 dwellings (South of Heron Hill Lane), are both given a score of 9 – the highest score attributed.

6.12 An assessment of the sites identified by the Borough Council that had full regard to Green Belt policy would explicitly take account of features such as incursion into the open Green Belt, ribbon-like development extending into the countryside, and merging with existing development.

6.13 A suitable approach to justify and assess potential development sites that may involve the use of Green Belt land in Gravesham would follow a sequential process including the following steps:

- 1 There should first be confidence that the capacity of urban regeneration sites will not in future provide for development needs, including smaller brownfield sites within the urban area
- 2 Undeveloped sites at the urban area but not in the Green Belt should be considered as next priority
- 3 If there were a clear justification to consider sites within the Green Belt, the search should not be confined to sites with in excess of 50 dwellings, should systematically examine the scope for smaller sites at the urban area in preference to rural sites, and should apply additional criteria appropriate to the Green Belt to maintain its “openness”, and to prevent “merging” of settlements or “encroachment” into the countryside.

6.14 Although the South East Plan was recently revoked, it sought to protect the Green Belt from development and to ensure that previously developed sites and

urban areas were the focus of growth and regeneration Gravesham, with just 100 dwellings located south of the A2. This principle should continue to be applied.

6.15 **It is therefore recommended** that KCC does not support either of the site selection methods offered in the consultation. KCC is opposed to “inappropriate” development in the Green Belt and **objects** to the Borough Council’s assessment of Green Belt sites for the reasons given above. KCC seeks a sequential approach as described in para 6.18 above.

(iii) Green Belt boundary changes

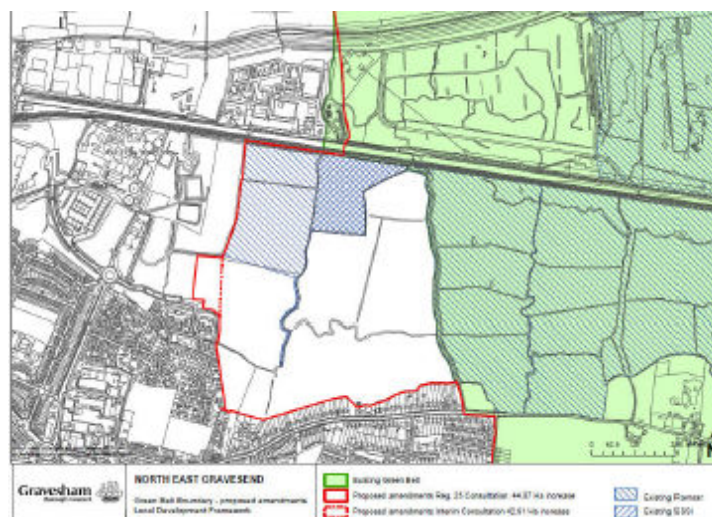
6.16 It is noted at para 6.12 above that the Borough Council proposes to take land at North East Gravesend into the Green Belt because they judge it is unsuitable for development. This site, plus land along the re-aligned A2² would add approximately 70ha to the Green Belt. Thus the Borough Council’s intention is that there would be no overall net loss of Green Belt if Green Belt sites were developed for housing.

6.17 **It is recommended** that KCC does not support an approach which regards additions to the Green Belt as justifying the loss of Green Belt elsewhere.

(iv) North East Gravesend

6.18 The *Gravesham Local Plan First Review (1994)*, Policies PM9 and AP19, allocated a large area at North East Gravesend for mixed development, acknowledging that adequate measures would be needed to counteract the effects of possible flooding³. A planning permission⁴ on the site has lapsed and has not been renewed. Policies PM9 and AP19 are “saved” by the Secretary of State’s Direction Letter of 25th September 2007.

Land at North East Gravesend



² A pavilion is currently being constructed as part of the cyclopark on this strip of land.

³ Policy PM9

⁴ GR/2005/0277 – for 20 homes

6.19 In response to the 2010 consultation⁵, KCC supported the current position and opposed extending the Green Belt to include this site. KCC Property and other landowners are currently discussing potential uses for the remainder of the PM9 area, and wish to promote further development within the AP19 area.

6.20 With the introduction of Planning Policy Statement 25 it is necessary take into account flood risk in the context of climate change, and this location is subject to proposals in *Thames Estuary 2100*⁶ (TE2100) for the long term management of flood risk. Also, since the site was first allocated, land adjoining it has been designated as a Ramsar site, and much more stringent tests of the impact of development nearby and its justification will apply.

6.21 The Borough Council's view is that North East Gravesend would not comply with PPS25 and should not be developed because there are alternative sites at lower risk of flooding elsewhere in the Borough. The TE2100 project shows that flood defences need to be fully upgraded to protect existing development at North East Gravesend, and the Borough Council believes it will be difficult to justify further development there without this improved defence. Funding for the TE2100 programme has yet to be approved.

6.22 The need to defend North East Gravesend against tidal flooding in the future, and the international status for nature conservation of adjoining land are important planning considerations that need to be weighed against the possible alternative of building in the Green Belt. The Borough Council suggests⁷ that a comprehensive master-plan is needed.

6.23 **It is therefore recommended** that KCC support further investigation of development possibilities within this site to determine whether flood risk can be managed and nature conservation interests protected, to the satisfaction of the Environment Agency and Natural England. Meanwhile the site should not be taken into the Green Belt, or ruled out for development.

(v) West of Wrotham Road

6.24 Land west of Wrotham Road is considered by the Borough Council to be the preferred site under both site selection methods. This site is not within the Green Belt and is close to Gravesend Town Centre. St George's primary school, a large Morrisons store and other facilities are nearby, and there are bus routes to the town centre and beyond.

6.25 The majority of the site is owned by Bovis Homes and part by KCC. The land was allocated in the *Gravesham Local Plan* and a proposal was made in 2008 by Bovis Homes for 400 homes, with landscaping between the development and the A227. KCC provided a scoping opinion, and questions of air quality and ecology were not considered to be insurmountable.

⁵ Gravesham LDF *Core Strategy and Development Management Policies January 2010*

⁶ A project undertaken by the Environment Agency to consider flood risk in the Thames Estuary to 2100.

⁷ Greenfield and Green Belt Site Assessment and Options Paper (Aug 2011) Page 37

6.26 **It is recommended** that KCC support the development of this site, and that if the Borough Council concludes that green field sites are required it should be the first choice for such development before Green Belt land.

(vi) Mineral wharves

6.27 KCC's responsibility for mineral wharves as the Mineral and Waste Planning Authority is an important factor in the approach taken to the regeneration of the riverside in Gravesend/Northfleet. The Borough Council's consultation in January 2010 safeguarded Bevans Wharf and Wharf 42. KCC has since published its *Strategy and Policy Directions for Minerals and Waste* which proposes that the following additional wharves in Gravesham are safeguarded:

- Robins Wharf
- Northfleet Wharf
- Denton Wharf
- Red Lion Wharf
- Botany Marshes

6.28 Of these Red Lion Wharf is located within the Northfleet Embankment East site, and Bevans Wharf, Wharf 42 and Robin's Wharf are within the adjacent Northfleet Embankment West site. The Borough Council supports the safeguarding of all the wharves except Red Lion Wharf, and has objected to KCC's *Strategy and Policy Directions for Minerals and Waste* because safeguarding the wharf would "*have implications for the future regeneration of Northfleet Embankment East*" (para. 23.5)

6.29 Red Lion Wharf is an important facility, importing up to 1 million tonnes of crushed rock and sand and gravel per annum. This trade uses large ships which need the deep water at this site, and some of the imported minerals are moved into central London by smaller vessels. The importance of using sustainable transport for the import and onward movement of essential construction aggregates is recognised in national minerals policy (MPS1), which requires the safeguarding of such facilities.

6.30 Wharves can be located only where conditions are suitable, and this stretch of the south bank of the River Thames is important in providing deep water berths for large ships at all states of the tide, combined with good access to the Key Arterial Routes network and suitable adjacent land for the storage and processing of imported minerals.

6.31 The safeguarding of Red Lion Wharf is essential to deliver a steady supply of construction aggregates into the North Kent area. Failure to do so would contravene national minerals policy, the draft NPPF, and KCC's emerging Minerals and Waste Development Framework Core Strategy. This could result in the local plan Core Strategy being considered 'unsound' at Examination in Public.

6.32 **It is therefore recommended that KCC objects** to the omission of Red Lion Wharf from the wharves to be safeguarded by the local plan, and that all wharves should be safeguarded.

6.31 In describing the vision for 2031 (para. 5.16) the Borough Council's consultation document refers only to Northfleet and Denton wharves as "*in use supporting local employment*". The Core Strategy should reflect the importance of mineral imports in Gravesham and identify all existing wharves. **It is therefore recommended** that KCC seek an amended sentence as follows:

"Northfleet Wharves include the Bulk Aggregate Importation Facility and Northfleet cement wharf (Bevans Wharf and Wharf 42), Denton Wharf, Red Lion Wharf, Robins Wharf and Botany Wharf. They are in use supporting local employment and supplying essential construction materials which provide the infrastructure, buildings and products that society, industry and the economy need".

(vii) Northfleet Embankment East

Dwelling and employment options

6.32 A masterplan was produced for this site by SEEDA, for mixed use development with 1,500 dwellings and a new primary school to replace the school at Rosherville. The Homes & Communities Agency (HCA) are new owners of the SEEDA land, and the masterplan is no longer considered to be deliverable. The key parties are understood to be exploring a preferred option for rail access which would enable the development of primarily employment uses offering rail, road and water access. The extent of any residential development and the impact on Red Lion Wharf have yet to be determined.

6.33 The consultation document invites views on alternative schemes with zero to 800 dwellings:

- Option A: 54,000 sq m of employment space and approximately 150 dwellings.
- Option B: 38,220 sq m of employment space and approximately 400 dwellings.
- Option C: 86,600 - 97,700 sq m employment floorspace (959-2048 jobs)
- Option D: Mainly dwellings – perhaps 800, and limited employment.

6.34 Consultants will identify which of Options A-C is the most feasible. Until this evidence is provided the Borough Council will progress Option A because it makes effective use of the site for multimodal development and retains the historic TT Electronics building and land to the south for housing. **Questions 15 and 16** ask which Option for the development of Northfleet Embankment East is preferred, or what alternatives are proposed.

6.35 The location of new homes in close proximity to Red Lion Wharf could jeopardise its future operation if noise, dust, light and air emissions from the wharf were experienced at the residential development.

6.36 It is **recommended that KCC** seeks a Core Strategy policy for Northfleet Embankment East that recognises the requirement to safeguard Red Lion Wharf. If current studies conclude in favour of mainly distribution, freight handling, and industrial uses, they should be developed in a manner compatible with the

continued operation of the wharf. KCC notes that the Borough Council will progress Option A to make effective use of the site for multimodal development, and retain the historic TT Electronics building and land to the south for housing. Option C which includes no dwellings would be preferred from a minerals point of view and to maximise the employment potential of the site, given its unique multi-modal access potential, but KCC wishes to work with the parties concerned to find a solution that will achieve all the objectives for the site

(viii) Economy and Employment

6.37 Gravesham has a high net outflow of commuters, and in the January 2010 consultation the Borough Council set a target of 10,000 new jobs by 2026 to address this imbalance between local jobs and resident workforce (Policy 10). With 9,300 dwellings also planned this represented a ratio of roughly 1 new job for each new dwelling. Half the new employment would be located at Ebbsfleet with the remainder in local service sectors, and existing riverside employment sites would be reconfigured, retaining the best and most versatile wharves.

6.38 The reduction in dwelling numbers to 4,600-5,200 proposed by the Borough Council will cause the labour supply working in Gravesham to decline by about – 1,200 to –1,600, assuming stable commuting patterns. This is because the ageing of the population as whole will mean more people of retirement age and fewer in the labour market.

6.39 The Borough Council has calculated the business space needed for each of the dwelling scenarios under consideration, including replacement of buildings which will be lost and a safety margin. The consultation document does not offer a revised Policy 10 on Economy and Employment and Policy 16 on strategic sites, but they will require amendment to reflect the changes above.

6.40 **Questions 9 and 10** of the consultation ask whether the Borough Council should continue to plan for a minimum of one net new job per dwelling, with the main employment sites broadly distributed as in the January 2010 consultation.

6.41 Table 2 of this report shows the small increase in employment space that results from reduced dwelling numbers on the strategic regeneration sites. The 351,080 sq m of employment space are estimated to accommodate 12,550 jobs. This greatly exceeds the target of 4,600 – 5,200 jobs implied by maintaining a ratio of 1 job to each new dwelling, even though the workforce is forecast to decline.

6.42 It is **recommended** that KCC supports the regeneration of strategic sites within Gravesham and efforts to improve the number and choice of local jobs. The current assessment of their capacity suggests that greater residential content would provide a closer balance of land uses. However, given the scope for changes in the movement of labour between Dartford and Gravesham, and to London via the High Speed rail services, a ratio of 1 job to each new dwelling should not be applied rigidly. The Borough Council's plans should allow flexibility in the mix of development on the strategic sites to ensure their delivery.

(ix) Retail

Gravesend Town Centre/Heritage Quarter

6.43 The regeneration of Gravesend Town Centre is a high priority in the Core Strategy and it is proposed that an additional policy is included which focuses specifically on the town centre.

6.44 The policy recognises the need to provide modern retail services and employment uses in terms of quantity, quality and range, while ensuring that the town centre maintains its architectural and heritage interest and that the environment is preserved and enhanced.

6.45 The Borough Council is also considering the production of a Supplementary Planning Document to provide more detailed planning guidance for the town centre. **Questions 3, 4, 5 and 6** of the consultation ask whether the vision and policy for Gravesend Town Centre and the boundaries identified are appropriate.

6.46 **It is recommended** that KCC supports the regeneration of the town centre and welcomes the focus that this new policy provides. It is important that any new development is carefully designed to ensure that it is in keeping with the scale and context of the town centre, particularly the Heritage Quarter. KCC would also welcome the production of a SPD.

(x) Transport Assessment

6.47 The consultation document states that the Kent Thameside transportation model will be rerun when the development strategy for Gravesham is clear, and will inform the policies in the Core Strategy and the projects in the *Infrastructure Delivery Plan* (para. 23.1).

6.48 As Highways authority, KCC believes a study of the new growth options must inform the choice of development strategy. It is likely that a reduction in dwelling numbers from 9,300 to 4,600-5,200 would result in better future traffic conditions in the urban area. Improvements to public transport are still likely to be needed, and the scope for these and the highway projects to be funded by development needs to be tested.

6.49 The Borough Council's options include development at the rural settlements south of A2 which have few local services and little employment. Development dispersed in such settlements is difficult to serve by public transport. New residents rely on private transport and must travel further to employment, shops and other services.

6.50 The cumulative effect of potential new sites on traffic conditions along the A227 will need to be considered, and whether it would be appropriate to seek developer funding towards improvements.

6.51 The *Greenfield and Green Belt Site Assessment* draws attention to potential highway problems to be overcome. Many of the rural options identified by the

Borough Council are served directly by unsuitable minor roads or have access through existing residential areas, and would require new or improved access and significant off site road improvements. There are thought to be questions of land acquisition and right of access to some of the sites. These matters require detailed assessment before the rural sites can be regarded as deliverable options.

6.52 **It is recommended** that KCC as Highways Authority express a strong preference in principle on transportation grounds for the location of development at the urban area for the reasons given above, and that the development sites should be assessed in the context of a study of the implications of the reduced dwelling numbers now proposed. Detailed assessment of the rural options identified would be needed to determine the practicality of access and off-site improvements.

(xi) Physical & Social Infrastructure (14) and Education Learning & Skills (9)

6.53 No major requirements for infrastructure were identified in the January 2010 consultation. The Borough Council recognises that it will need to work with relevant service providers to understand the infrastructure needed in the light of changes since the previous consultation, and how it will be delivered. An *Infrastructure Delivery Plan* (IDP) will be produced setting out detailed requirements arising from the proposed development (para. 14.2).

6.54 The Core Strategy will address changes to S106 planning obligations, the introduction of the *Community Infrastructure Levy* and the viability of development. It will recognise that infrastructure to support development must be provided and the costs should be borne by the developer (para. 14.4).

6.55 The implications of the alternative development scenarios for KCC services are being examined further, but at present the matters to be addressed include the following:

Schools

6.56 Future pressure on schools should be eased by the reduction in dwelling numbers proposed compared to those in the South East Plan. Even so significant new development at the Gravesend/Northfleet/Ebbsfleet urban area will require additional school capacity, and this will need to be funded by developers.

6.57 The change in development proposals at Northfleet Embankment East to largely commercial uses will prevent the relocation of Rosherville primary school to that site, but also substantially remove the need for new capacity to serve residential development on the site. An alternative site for the relocation of Rosherville school is being examined in the context of the development of Ebbsfleet and the need for school capacity in the Northfleet area as a whole.

6.58 Residential development on the scale being examined at Istead Rise and Culverstone Green/Vigo might be acceptable in terms of primary school capacity, but development in Meopham is not sustainable.

6.59 The capacity issue in existing urban schools would be exacerbated if all the urban/edge of urban sites suggested were implemented. New schools would be required, and this would require developer contributions and the acquisition or transfer of land. However, the combined capacity of these sites greatly exceeds the 320-920 dwellings for which the Borough Council seeks land.

6.60 The resulting impact on secondary schools appears to be similar to that for primary schools, but not to the same extent. For each of the sites being considered (urban and rural) the pupil numbers could probably be accommodated within expanded facilities at existing schools.

6.61 Given the stopping of the *Building Schools for the Future Programme* which affected a number of schools in the Gravesham area, to ensure that the authority is able to maximise opportunities to bring forward investment within the school estate, KCC may wish to consider opportunities at existing school sites to release urban land for housing or other suitable use. This could require identification of alternative sites at the edge of the urban area and the possibility of school buildings encroaching on Green Belt land. KCC will explore the options available with the Borough Council so that if necessary proposals can be reflected in the submission version of the Core Strategy

Adult services

6.62 In future more support will be provided by KCC at home for vulnerable adults, and this will create a need for more community hubs, village halls etc. that are fully accessible. These will be used by the statutory agencies to deliver assessments, provide support and ensure the health and wellbeing of vulnerable people, and provide opportunities for them to meet. Voluntary agencies and other providers may deliver these services for the statutory agencies, and may run the hubs.

6.63 Good transport links are essential between new developments and community hubs. Travel times from rural areas to hubs located in Gravesend will be longer than from within the urban area, and public transport is likely to be less practical.

6.64 The provision of up to 920 dwellings outside the urban area would lead to only about 17 new service users, but there would be a cost to providing services for them. KCC's preference is for development to be concentrated within the urban area or on the fringe of the urban area to reduce travel.

Community Services

6.65 While library, adult education and youth services are being reorganised it is difficult to identify the specific requirements that will arise from the development proposals. However, as an alternative to new buildings, existing library opening hours may be extended, book stock/equipment increased and new mobile provision made whenever possible. This will enable KCC to expand library services and offer additional youth sessions and adult education classes. KCC is seeking short term financial support for such services in the localities where

development takes place, in place of capital contributions. As decisions are made about service delivery, more detailed plans will become available.

6.66 **It is recommended** that KCC invite the Borough Council to continue the dialogue on the implications for KCC services of development in the Borough, and to reflect the outcome in their Core Strategy, *Infrastructure Delivery Plan* and CIL charging schedule.

(xii) Funding for infrastructure, new land, and use of KCC property

6.67 The highways, schools and other essential services on which development depends and for which KCC is responsible must be funded by S106 agreements, and in future by the *Community Infrastructure Levy* (CIL). However, as a first tier authority KCC does not have power to levy CIL, or to prioritise its use, and the use of S106 agreements will be limited when CIL is introduced.

6.68 KCC requires that land for new facilities and infrastructure is provided developers free of charge. KCC also wishes to work with local authorities and their communities on the modernisation of its property to match changes in service delivery, expects to increasingly use its property to provide more than one service from the same building. Land allocations will need to reflect this. There may be disposal of some assets to part fund new infrastructure in existing communities, releasing urban land for housing or other suitable uses.

6.69 If new school sites or land for other services are required this should be confirmed in the Core Strategy and the land allocated. All infrastructure and service projects that are required should be included in the *Infrastructure Development Plan* as officers will use this to determine whether to support contribution requests.

6.70 In the light of the above **it is recommended** that KCC welcomes the recognition that the costs of serving development should be borne by the developer (para. 14.4) but requests the Borough Council to include in policy to the effect that:

- development will be required to contribute proportionately, either financially or in kind, to land and build costs for services and infrastructure needs which arise from demand generated by that development
- site(s) for schools and other services. will be allocated in the appropriate Development Plan Document, and where they are located on development sites the developer should provide land, fit for development, at no cost to KCC.
- it will be necessary for the Borough Council to pass CIL revenue to KCC for schools, highways and other services.

6.71 **It is recommended** that the accompanying text should also recognise that:

- KCC projects to support new development will change in the light of operational and other considerations
- KCC will use its property in a flexible way to provide more than one service from the same building, and that land allocations will need to reflect this.

(xiv) Environment

Energy and water

6.72 The Borough Council proposes to take forward the conclusions of the *Kent Thameside Eco Assessment* into the final draft of the Core Strategy. The Council also intends to produce a Supplementary Planning Document (SPD) on sustainable design and construction and to consider the renewable and low carbon energy potential of the major development sites. It will also address further the question of water demand management.

Heritage

6.73 KCC supported the section on Heritage in the January 2010 consultation and the Borough Council considers no amendments are necessary.

Green Infrastructure/Open Space

6.74 The Borough Council has agreed that opportunities to enhance, restore and re-create habitats should be sought within new development, as recommended by KCC and that the targets, timescales, and funding streams necessary for implementation should be included in the Core Strategy.

6.75 **It is recommended** that KCC supports the approach taken by The Borough Council to energy, water, heritage and green infrastructure.

7 Recommendation

The Deputy Leader of the Council is asked to agree the proposed responses by KCC highlighted in section 6 of this report, together with a schedule of detailed points.

Background Documents

1. Gravesham Borough Council Consultation on Core Strategy and Development and Management Policies Development Plan Document Regulations 25 (Issues and Options) – January 2010
2. Growth Scenarios and Core Strategy – Interim Consultation Document (Regulation 25 Update) October 2011
3. Growth Scenarios Technical Paper October 2011
4. Greenfield and Green Belt Site Assessments and Options Consultation October 2011

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