

Report to: Bryan Sweetland, Cabinet Member for Environment, Highways & Waste

By: Paul Crick, Director of Planning and Environment

Subject: KCC response to the consultation by Gravesham Borough Council on the Local Plan Core Strategy Proposed Submission.

Classification: Unrestricted

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**Summary:**

This report proposes representations by KCC on Gravesham Borough Council's submission version of their Core Strategy. The Borough Council proposes that a minimum of 4,600 jobs and homes will be provided, concentrated on previously developed land along the Thames Riverside, at Gravesend Town Centre and at Ebbsfleet. The Green Belt, Kent Downs Area of Outstanding Natural Beauty, the historic environment and biodiversity in the Borough will be safeguarded and maintained.

The recommendations in part 5 of this report largely support the policies of the local plan, but include objections to the failure to safeguard the mineral importation facility at Red Lion Wharf, and to the use of the Green Belt for any housing provision. KCC's representations on the submission version of the Core Strategy are a decision in the Forward Plan for the Cabinet Member for Environment, Highways and Waste.

## **1 Introduction**

1.1 Gravesham Borough Council is inviting representations on the proposed submission version of their local plan Core Strategy. The consultation ends on 12<sup>th</sup> February 2013, and the Core Strategy will then be submitted to the Secretary of State in May 2013. An Examination in Public is expected in August 2013 and adoption of the plan in December 2013.

1.2 A report on the proposed submission document was discussed at EHW Cabinet Committee on 10<sup>th</sup> January 2013. Prior to the debate Mr Crick stated that the views of all relevant local Members will be sought and included in the papers that come before the Cabinet Member before he makes his decision. Local Members were asked on 10<sup>th</sup> January to give their views by 25<sup>th</sup> January, and none have been received.

1.3 The recommendations in this report are those that the Cabinet Committee resolved to support. However, the text has been amplified to include points of clarification provided by Mr Crick during the Committee discussion with regard to KCC support for supported the target of 4,600 dwellings as a minimum to 2028 (para. 5.5) and for the residential development of land West of Wrotham Road (para. 5.6).

## **2. Financial Implications**

2.1 The decisions to be taken by the Borough Council may have long term financial implications for KCC as the provider of infrastructure and services to support development.

## **3 Bold Steps for Kent and Policy Framework**

3.1 The proposed response by KCC to the consultation supports the County Council's ambition to grow the economy, and the following priorities of *Bold Steps for Kent*:

- Priority 5: Deliver the Kent Environment Strategy
- Priority 8: Respond to key regeneration challenges, working with partners
- Priority 9: Support new housing growth that is affordable, sustainable and with the appropriate infrastructure
- Priority 10: Deliver 'Growth without Gridlock'

## **4. KCC's Response to the Core Strategy and Growth Scenarios Consultation in 2011**

4.1 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. Following the publication of the Localism and Decentralisation Bill, which enabled the revocation of the South East Plan, the Borough Council proposed a revised approach in the Gravesham Growth Scenarios and Core Strategy consultation in October 2011. This invited views on development options for Gravesham to 2031, and on amendments to the policies published in 2010.

4.2 It is important that KCC takes a consistent view on local plan proposals. In summary, KCC's main views on the draft Core Strategy and Growth Scenarios in October 2011 were as follows:

### *Housing*

4.3 The consultation document assumed that Gravesham's preferred scenario would require 4,600-5,200 new dwellings from 2011 to 2031. The target was for 5,200 dwellings, and it was necessary to identify new sites for 320 to 920 dwellings. In order to meet the target the Borough Council considered the development of greenfield sites at the urban area and/or sites within the Green Belt.

4.4 Although KCC had previously supported the target of 9,300 dwellings for the period 2006-26 proposed by Gravesham in their 2010 consultation, in accordance with the South East Plan, KCC accepted that this was over optimistic and supported the Borough Council in seeking a more realistic total. KCC supported the Borough Council's target of 5,200 dwellings to 2031, unless their studies demonstrated that a higher value could be accommodated within the urban area.

4.5 KCC objected to the allocation of residential sites within the Green Belt, and did not support the site selection methods offered in the consultation. KCC objected to the Borough Council's assessment of Green Belt sites.

4.6 KCC supported further investigation of development possibilities within a site at North East Gravesend, outside the Green Belt. Meanwhile the site should not be taken into the Green Belt, or ruled out for development.

4.7 KCC supported the development of land West of Wrotham Road, and if the Borough Council concluded that green field sites are required this should be the first choice for such development before Green Belt land.

#### *Mineral Wharves*

4.8 KCC objected to the omission of Red Lion Wharf from the mineral importation wharves to be safeguarded by the local plan, and considered that all wharves should be safeguarded.

#### *Employment*

4.9 KCC supported the regeneration of strategic sites within Gravesham and efforts to improve the number and choice of local jobs, but considered that a ratio of 1 job to each new dwelling should not be applied rigidly.

#### *Transport*

4.10 KCC as Highways Authority expressed a strong preference on transport grounds for the location of development at the urban area, and that the development sites should be assessed in a study of the implications of reduced dwelling numbers.

#### *Physical & Social Infrastructure and Education Learning & Skills*

4.11 KCC invited the Borough Council to continue a dialogue on the implications for KCC services of development in the Borough, and to reflect the outcome in their Infrastructure Delivery Plan and their CIL charging schedule.

#### *Funding for infrastructure, new land, and use of KCC property*

4.12 KCC welcomed the recognition that the costs of serving development should be borne by the developer but requested the Borough Council to include policy to the effect that:

- KCC services to support new development must be funded by developer contributions, and that it will be necessary for the Borough Council to pass CIL revenue to KCC for schools, highways and other services.
- 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.

## **5 KCC Response to Proposed Submission Consultation**

(i) *Scale and Distribution of Development*

5.1 The submission document provides a clear and succinct statement of planned development in Gravesham which is welcomed. It proposes four opportunity areas within the Borough where the majority of development will be delivered during the plan period, as follows:

- Northfleet Embankment and Swanscombe Peninsula
- Gravesend Riverside East and North East Gravesend
- Gravesend Town Centre
- Ebbsfleet (Gravesham part)

5.2 Policy CS02 includes provision for the scale and distribution of development as follows:

*Policy CS02: Scale and Distribution of Development*

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*The development strategy for the Borough is to retain and improve the existing stock of housing and suitable employment land and to make provision for the Borough's objectively assessed need for at least 4,600 new dwellings and 4,600 new jobs during the plan period.*

*Approximately 3,387 new dwellings and 4,634 new B class jobs will be provided in the opportunity areas in the urban area.*

*Approximately 877 new dwellings and 240 new B class jobs will be provided in the rest of the urban area ..; and*

*Approximately 71 new dwellings will be provided in the rural area*

*In the rural area, the extent of the Green Belt, as defined on the Policies Map, will be maintained and protected from inappropriate development.*

5.3 It is **recommended** that KCC welcomes the distribution of development proposed in Policy CS02 and confirmation that the Green Belt, as defined on the Policies Map, will be maintained and protected.

(ii) *Housing Target*

5.4 The Borough Council's "objectively assessed need for at least 4,600 new dwellings" is for the plan period from 2011 to 2028 and takes into account past migration trends and the availability of land that is not in the Green Belt or heavily constrained. Over 3,700 new dwellings will be delivered through existing planning permissions and key sites within the four opportunity areas. The remaining housing needed will be delivered through a combination of unallocated sites, small windfall sites accommodating less than 5 dwellings each and completed units as in Table 1:

Table 1: Housing Land Supply

A) Sites with outstanding permissions at 31 March 2011 including ones subject to a legal agreement being signed	2,999
B) Emerging Core Strategy Key sites without planning permission – adjusted capacity (to avoid double counting with approvals above)	772
C) Specific unallocated sites have the potential to make a contribution to housing delivery during the 5 yr period (e.g. SLAA sites not covered by A) or B) above)	387
D) Small windfall sites	330
E) Completions	177
Total	4665
Core Strategy Housing Requirement	4,600

5.5 A total of 4,600 dwellings is less than the South East Plan target of 9,300 dwellings 2006-26. It is likely to be examined closely by the Inspector at the public hearing, who could recommend a higher value in response to national policy for housing land, especially if evidence of additional land supply were to come forward. It is important that a higher value should only be considered if it could be achieved without taking Green belt land. In 2011 KCC supported a target of 5,200 dwellings to 2031 unless the Borough Council's studies demonstrated that a higher value could be accommodated within the urban area. It is **recommended** that KCC supports the target of 4,600 dwellings as a minimum to 2028, but would encourage that this figure is exceeded if further suitable development sites come forward that are not in the Green Belt.

*(iii) Strategic Housing Sites – Land West of Wrotham Road*

5.6 In response to the consultation in 2011 KCC supported the development of land West of Wrotham Road, and if the Borough Council concluded that green field sites are required KCC proposed that this site should be the first choice for such development before Green Belt land. However, the draft submission document does not identify this site for residential development. Again, if the dwelling target for Gravesham were proposed to be increased as a result of the public Examination, KCC would wish land at Wrotham Road to be considered for release before development within the Green Belt.

5.7 It is therefore **recommended** that the County Council confirms its support for the residential development of land West of Wrotham Road as identified in the 2011 consultation on options.

*(iv) Affordable housing and Gypsies and Travellers*

5.8 The Borough Council expects new development to provide a variety of dwelling types and sizes, with an increased proportion of housing designed to lifetime homes standard, and some for wheel chair access. Policy CS16 sets affordable housing provision at 30% of new dwellings on sites over 15 units in the urban areas and 35% in rural areas on sites over 3 units, subject to site viability. However, we **object** to any provision of affordable housing in the Green Belt.

5.9 Gravesham's current evidence suggests the need to provide an additional 15 gypsy and traveller pitches in the Borough 2006-11, and this has been partially addressed by 8 new pitches at Springhead Road, Northfleet. The Borough Council is updating its assessment of need using a method in common with adjoining local authorities. The revised target will be included in a future Development Plan Document. This assessment of need is expected to be completed in 2013. Policy CS17 commits the Borough to work with neighbouring planning authorities to identify sufficient sites to meet the most up to date need assessment.

5.10 It is **recommended** KCC supports the general approach to affordable housing and to the provision of Gypsy and Traveller sites in Policies CS16 and 17, but objects to use of the Green Belt.

(v) *Employment land*

5.11 Policy CS02 includes a target for at least 4,600 new jobs during the plan period. The majority of these will be delivered in the opportunity areas and the urban area, with a small number in the rural area, as summarised in Table 2 and supported by Policy CS07. Among the opportunity areas is the *Swanscombe Peninsula East Undeveloped Area* where the local plan suggests development potential is likely to be constrained by a number of factors (para. 4.4.3). Policy CS03 states that any future proposals for the area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, access, ground conditions etc. This area is part of the land at Swanscombe Peninsula suggested for the major Paramount leisure development.

Table 2 Employment Floorspace – Business uses

	Employment Floorspace**	Job Numbers**
Northfleet Embankment and Swanscombe Peninsula East*	144,000 sq. m	2,269
Gravesend Riverside East & North East Gravesend	20,000 sq. m	548
Gravesend Town Centre	5,000 sq. m	401
Ebbsfleet	17,000 sq. m is B Class floorspace	1,416
Rest of Borough*	4,300 sq. m	240
<b>Total</b>	<b>160,800 sq. m</b>	<b>4,874</b>

\* Excludes floorspace figures for LaFarge Bulk Aggregates Import Terminal, Northfleet

\*\* Based on Core Strategy Opportunity Area Policies only as shown in Core Strategy.

Excludes jobs generated from non B Class employment use classes.

5.12 It is **recommended** that the County Council supports Gravesham Borough Council's target for jobs, and its economic vision and strategy set out in Policies CS02 and CS07, which are consistent with the National Planning Policy Framework requirement to support economic growth. However, Policy CS03 should support the investigation of large scale leisure use for Swanscombe Peninsula East Undeveloped Area.

(vi) *Retail*

5.13 The updated Retail Study concludes that Gravesend town centre is best placed to accommodate the additional floorspace required by 2028 (Table 3), with a small amount elsewhere in the Borough. The Core Strategy does not consider the possible impact on demand of the proposed extension to the Bluewater regional centre nearby in Dartford Borough.

Table 3: Additional Retail floorspace required to 2028

Comparison goods – gross sq. m	22,210
Convenience goods – gross sq. m	2,180
Total – gross sq. m	24,390

5.14 Policy CS08 identifies the Primary Shopping Area in Gravesend town centre as the preferred location for new retail development. Because there are insufficient sites available to accommodate the total need over the plan period, retail development is also supported at the Heritage Quarter key site, located adjacent to the Primary Shopping Area.

5.15 It is **recommended** that the County Council supports the proposed approach to retail development in Policy CS08 as consistent with the priority to be given to town centres in the National Planning Policy Framework.

*(vii) Infrastructure Provision*

5.16 Policy CS10 states that where new development leads to the need for new or improved physical or social infrastructure developers will be required to provide or contribute towards this, subject to viability. The submission Core Strategy includes an Infrastructure Delivery Schedule (IDS) which includes a number of KCC projects (Appendix 4). These are summarised below:

*Education Learning and Skills*

5.17 The IDS identifies the need for new pre-school nurseries and a 2 Form Entry primary school to support new residential development at the Springhead Quarter and Northfleet Rise Quarter. The need for additional primary and secondary school places has also been identified to meet demand from other residential development within the Borough, and these additional places will be delivered in Gravesend and Northfleet. KCC will be seeking to ensure the existing secondary schools that were not part of the Building Schools for the Future programme are modernised and the re-provision will be enabled by creative use of public sector assets which may include enabling residential development.

*Families and Social Care*

5.18 Two new community hubs are included in the IDS to support development at Ebbsfleet and the Canal Basin, from which FSC can deliver its services. The provision of ‘telecare’ is also included in the IDS.

*Customers and Communities*

5.19 The IDS includes KCC's requirement for a new library at Ebbsfleet to support residential development, in addition to developer contributions towards additional book-stock and resources for the other libraries in the Borough. A new adult education centre and a venue for youth services are included in the IDS to support growth in the Borough.

5.20 KCC officers have been working closely with officers from Gravesham to establish project requirements and the details of the projects in the IDS are as provided by KCC officers in October 2012. It is therefore **recommended** that the County Council supports the KCC social infrastructure projects in the Infrastructure Delivery Schedule.

*(viii) Transport*

5.21 KCC officers have worked with Gravesham Borough Council on the Transport Paper that forms part of the evidence for the Core Strategy. However, at present there is no Transport Strategy for Gravesham. Work over the coming months will finalise the Strategy, and an Action Plan and monitoring regime. The aim is that the Transport Strategy will be sufficiently flexible to accommodate uncertainties about the timing and detail of development.

5.22 The Core Strategy recognises that the capacity of Dartford Crossing is considerably overloaded for large periods for the day. A study carried out on behalf of the Department for Transport has identified three longer term options to provide additional capacity and further work is being carried out. DfT will be undertaking a consultation exercise on all 3 crossing options in the summer of 2013.

5.23 The provision needed for transport in Thameside as a whole will need to be reconsidered in the light of the proposed extension to the Bluewater retail centre, and the possibility of major leisure development on Swanscombe Peninsula.

5.24 KCC would **welcome** amendments to the text of the Core Strategy to clarify the need for public transport connections to both classic and high-speed rail services from Ebbsfleet and Gravesend stations. Reference should be made to the Transport Quarter and to the Rathmore Road Link, which is the subject of a planning application.

5.25 Policy CS11 states that new developments should mitigate their impact on the highway and public transport networks as required. It is therefore **recommended** that KCC supports the approach to transport in the submission Core Strategy, subject to the amendments requested in 5.24 above. However, further work on the options to provide additional capacity for the Thames crossing, and the implications of an extension to the Bluewater retail centre plus the possibility of a major leisure development on Swanscombe Peninsula, may require an early review of the Core Strategy transport provision and policies

*(ix) Minerals and Waste - Red Lion Wharf*

5.26 KCC as the minerals planning authority for Kent has a responsibility to ensure a supply of mineral aggregates and to safeguard mineral importation

wharves. Red Lion Wharf is an important source of imported aggregates and is located within the *Northfleet Embankment and Swanscombe Peninsula East Opportunity Area*.

5.27 The Homes and Communities Agency is preparing a masterplan for this site for industry and warehousing with a rail freight connection to High Speed 1 and access to deep water wharves. The development is likely to have implications for the operation of Stema Aggregates at Red Lion Wharf, but these could be overcome as the design of the site evolves. However, if this were not possible the Borough Council will give priority to the comprehensive regeneration of the area over the existing use for minerals imports. In its view, to do otherwise would prejudice the delivery of the Core Strategy and effectively sterilise much of this important site (para. 4.4.21)

5.28 The safeguarding of wharves is supported by the Borough Council in general terms to enable river freight handling and to reduce dependence on road transport. However, the Borough Council considers that a more flexible approach to Red Lion Wharf is required to enable the regeneration of the area Policy CO3 for *Northfleet Embankment and Swanscombe Peninsula East Opportunity Area* gives priority to the regeneration of Northfleet Embankment East Regeneration Area over the existing use (para. 5.5.22).

5.29 Red Lion Wharf is identified in KCC's *Kent Minerals and Waste Development Framework Core Strategy* policy on safeguarded wharves and railheads (Policy CSM10) as a site which is safeguarded for its continued use for the importation of minerals into Kent (see Appendix 2 – KCC “Strategy and Policy Directions May 2011”). The Borough Council has supported the safeguarding of all the wharves in Gravesham except Red Lion Wharf, and has objected to KCC's policy because in its view safeguarding the wharf would “*have implications for the future regeneration of Northfleet Embankment East*” (para. 23.5).

5.30 It remains KCC's intention to safeguard Red Lion Wharf for aggregate importation in the Minerals and Waste Plan pre-submission document, which is due for consultation in June 2013.

5.31 The NPPF (paragraph 143) requires Mineral Planning Authorities, in preparing Local Plans, to ‘*safeguard existing, planned and potential railheads, rail-links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials...*’. It is therefore clear from the NPPF that all existing, planned and potential wharfs have to be safeguarded.

5.32 Stema Shipping (UK) have confirmed that Red Lion Wharf is extremely important to their operations as it imports up to a million tonnes of aggregate annually and has capacity to increase this. It is also used for the trans-shipment of aggregates by river into London. Stema Shipping (UK) have confirmed to KCC (December 2012) that they are interested only in keeping the site for the import of aggregates. SEEDA had accepted there are no alternative suitable wharfs to replace Red Lion Wharf.

5.33 The safeguarding of Red Lion Wharf is essential to deliver a steady supply of construction aggregates to the North Kent area. Failure to do so would contravene national minerals policy and KCC's emerging Minerals and Waste Development Framework Core Strategy.

5.34 It is therefore **recommended** that in accordance with national planning policy, the County Council should **object** to the absence of a policy commitment in the local plan to safeguard Red Lion Wharf as an aggregates importation wharf, and to safeguard all existing, planned and potential mineral wharves.

(x) *Environment*

5.35 Policy CS12 of the consultation document concerns green infrastructure including landscape and biodiversity. The policy seeks the creation of multifunction green spaces and footpaths, cycle routes and wildlife corridors. It proposes that designated areas such as SSSI and Ramsar sites are protected. Opportunities to enhance, restore, re-create and maintain habitats are sought, and landscape character is to be maintained especially in the Kent Downs AONB.

5.36 It is **recommended** the County Council supports Policy CS12 as it complies with national policy for the preservation, restoration and re-creation of priority habitats and ecological networks (para. 117 of the NPPF).

## 6 Conclusions

6.1 The Cabinet Committee RESOLVED that the Cabinet Member for Environment, Highways and Waste be recommended to approve the proposed representations by KCC as follows:

- (a) welcomed the distribution of development proposed in Policy CS02 and confirmation that the Green Belt, as defined on the Policies Map, would be maintained and protected;
- (b) supported the target of 4,600 dwellings as a minimum to 2028, which might be exceeded if further suitable development sites came forward that were not in the Green Belt;
- (c) confirmed its support for the residential development of land West of Wrotham Road as identified in the 2011 consultation on options;
- (d) supported the general approach to affordable housing and to the provision of Gypsy and Traveller sites in Policies CS16 and 17, but objected to use of the Green Belt;
- (e) supported Gravesham Borough Council's target for jobs, and its economic vision and strategy set out in Policies CS02 and CS07 which were consistent with the National Planning Policy Framework requirement to support economic growth. However, Policy CS03 should support the investigation of large scale leisure use for Swanscombe Peninsula East Undeveloped Area;
- (f) supported the approach to retail development in Policy CS08 as consistent with the priority to be given to town centres in the National Planning Policy Framework;

(g) supported the KCC social infrastructure projects in the Infrastructure Delivery Schedule;

(h) supported the approach to transport in the submission Core Strategy, subject to amendments to the text of the Core Strategy to clarify the need for public transport connections to both classic and high-speed rail services from Ebbsfleet and Gravesend stations. Reference should be made to the Transport Quarter and to the Rathmore Road Link, which was the subject of a planning application. Further work on the options to provide additional capacity for the Thames crossing, and the implications of an extension to the Bluewater retail centre plus the possibility of a major leisure development on Swanscombe Peninsula, might require an early review of the Core Strategy transport provision and policies;

(i) objected to the absence of a policy commitment in the local plan to safeguard Red Lion Wharf as an aggregates importation wharf, and to safeguard all existing, planned and potential mineral wharves; and

(j) supported Policy CS12 as it complied with national policy for the preservation, restoration and re-creation of priority habitats and ecological networks.

## 7 Recommendation

### **Recommendation:**

The Cabinet Member for Environment Highways and Waste is asked to agree to the proposed KCC responses to the consultation as set out in Part 5 of this report, and summarised in the conclusions at Part 6. The formal response will be submitted to Gravesham Borough Council, together with a schedule of detailed comments.

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## **Background Documents**

1. Gravesham Borough Council Consultation on Core Strategy Proposed Submission (December 2012).  
<http://localplan.gravesham.gov.uk/consult.ti/Regulation19/consultationHome>
2. Report to EHW Cabinet Committee - 10<sup>th</sup> January 2013  
<https://democracy.kent.gov.uk/documents/s37504/Item%20B1%20-%20Gravesham.pdf>

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