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COUNCILS AND
COMMUNITIES
IN PARTNERSHIP

Kevin Burbidge
Direction (Regeneration and Regulation)
Gravesham Borough Council
Civic Centre - Windmill Street
Gravesend
Kent DA12 1AU

22 NOV 2007

20 November 2007

Dear Mr Burbidge,

**Re. ISSUES AND OPTIONS CONSULTATION
CORE STRATEGY KEY ISSUES AND OPTIONS REPORT
KENT THAMESIDE STRATEGIC TRANSPORT PROGRAMME**

I write in relation to the Issues and Options consultation on the above two local development documents. The Assembly welcomes the opportunity to comment at this early stage and our comments are attached. As you will note from the officer comments attached, a number of areas of concerns have been identified and we look forward to working with Gravesham Borough Council to address these.

Please also be advised that in relation to the Kent Thameside Strategic Transport Programme document, the Assembly had previously responded to consultation issued by Dartford Borough Council. For completeness, a copy of our response is attached to this letter.

Please contact me on 01483 555246 or at kevinhazell@southeast-ra.gov.uk if you would like to discuss these matters further. We would be happy to meet to further discuss the comments we have made if you wish.

Yours sincerely,

A handwritten signature in black ink, appearing to read "K Hazell".

Kevin Hazell
Regional Planner



**SOUTH EAST ENGLAND REGIONAL ASSEMBLY
CORE STRATEGY KEY ISSUES AND OPTIONS REPORT
OFFICER COMMENTS**

General Comments

Whilst it is evident that a substantial amount of work has gone into preparing the Issues and Options Report, we feel that at this early stage a more appropriate series of realistic and meaningful options for the future spatial development of Gravesham are needed.

Assembly officers understand the pressures being faced by local authorities as they seek to implement the local development framework system of plan-making. However, there is now a substantial body of information available to support the development of local development frameworks, including the numerous inspectors' reports into sound and unsound core strategies, as well as more recent guidance issued by the Planning Advisory Service and PINS. Based on these and other pieces of guidance, we are particularly concerned that the early development of the Gravesham Core Strategy may not be taking an approach which enhances the soundness of the final document.

In addition to some general comments below, we have also undertaken a detailed review of the issues and options report and our comments are contained in the attached table. We recognise that in many instances other local authorities who have taken a similar approach to you at issues and options then move quickly to a more spatial approach at the preferred options stage. We would certainly encourage and welcome this, subject to Gravesham being satisfied that such an approach is consistent with the Tests of Soundness.

Our specific comments include:-

1. The need to take a spatial planning approach

The PINS guide on Lessons Learnt Examining Development Plan Documents (June 2007) sets out that meaningful options should be developed on matters such as the broad location and balance of development across the authority area, the management of the housing supply, and the balance between employment and housing. We feel that these fundamental parts of the strategy could be set out more clearly, particularly given that the issues and options work underpins much of the subsequent development of the Core Strategy and so there could be some risk of the Core Strategy being less than fully sound.

2. The need to provide meaningful options

The recent PINS guidance has stressed the need for options to be reasonable and realistic. However, we have some concern with the type of options presented. This includes:-

- Options which appear to be contrary to the RSS (and the emerging South East Plan). This includes, for example, options about employment / housing growth which appear to contemplate provision at variance with the emerging South East Plan (e.g. Options 2(c) on Page 128 which suggests housing supply could be reduced from South East Plan levels). Identifying options contrary to the RSS would appear to be less than ideal, particularly given that the Test of Soundness on general conformity with the RSS.
- Options which appear to be contrary to national policy as well as the RSS. This includes, for example, Option (b) on Page 25 which presents 'growth in car use with little or no

shift towards alternatives' as an option. It is considered that presented such options are not particularly realistic or reasonable.

3. The need to have an implementation focus

The Core Strategy should be implementation focused and show how policy is going to be applied, and given effect to, locally. Some options, including those about community infrastructure on Page 89/90 and climate change on Page 148, set out generic policy commitments rather than options for how these policy commitments are going to be implemented in Gravesham. It is unclear therefore what value they add when considering policy contained at the National and regional level.

4. The need to be delivery focused

There are many options presented which do not provide a sense of scale and quantity to the options presented. For instance, options about retail development (Page 64) could be made more delivery focused (and therefore more meaningful) by outlining how much retail provision is actually being contemplated in each of the options. The same comments also apply to housing and employment development. This would then give a much clearer picture as to the possible / proposed distribution of new development across the local authority area. Further, linking these to the sub-regional policy framework in the draft South East Plan, the evidence base (and existing planning permissions where relevant) provides information which helps justify what the preferred option might be. It could also help clarify which of the options are evidence led and which ones might be more based on aspiration. A greater focus on scale and quantity will also allow this to be followed through, as the Core Strategy develops, to systems and processes for monitoring the plan and its delivery.

PAGE	SECTION	COMMENT
14	Key Spatial Objectives	All of these objectives could be given a greater delivery focus by specifying the extent of change which the Core Strategy is seeking to achieve. This could be an iterative process as policies develop to ensure the outcomes are achievable but at this stage it is unclear 'what' it is that is trying to be achieved in practical terms.
14	SO1	This does not appear to be an objective. Delivering the major development sites would sit better as a policy to implement other objectives (e.g. meet housing needs, deliver new jobs) rather than being an objective itself.
15	SO2 SO3	This objective could be enhanced by outlining within the objective what those requirements are in terms of employment (e.g. jobs, floorspace) subject to the final South East Plan being approved.
15 16 17	SO5 SO6 SO7 SO8 SO9 SO10 SO11 SO12 SO13	<p>These objectives add little value and could apply to any place in the South East.</p> <p>The opportunity could be taken to set out objectives which really drive the development of policy options which seek to deliver the objective (e.g. an objective relating to transport and air quality (SO10) could talk about the level of mode shift sought or the reduction in pollution sought. This could drive real and challenging options for how that could be achieved).</p>
17	SO14	Parts of this objective are excellent in that they relate to a specific geographical area, set out the key purpose being sought (e.g. boating centre en-route from Channel to London), and explain why (to support regeneration). This is beginning to be a spatial objective and is welcome.
17	SO15	Given that a large part of the borough is within 'the countryside', this objective should set a positive direction for how these areas and communities will be managed beyond repeating national and regional policy.
17	SO16	This objective should set out what future is being sought for rural areas.
24	Key Options 1	<p>These options need to be developed in a more rigorous approach. For instance, it is unclear how much of the Gravesham housing target is contained in existing permissions and how much is outstanding. A draft PPS3 housing trajectory with commitments shown and the shortfall would be an ideal way to communicate this information.</p> <p>The option could more usefully refer to how and where (e.g. specific geographic areas in the borough) the additional housing, not yet committed, is to be delivered. This could then be analysed through an assessment of policy led preferred locations for housing (e.g. starting with land not subject to flooding, town centre locations, then brown-field land, then greenfield land) and how many houses could be sourced from each type of land.</p> <p>This would show how necessary it is to consider options such as the release of greenfield land and allow an informed decision by those responding to consultation as to how the not yet committed new housing is to be delivered.</p>

PAGE	SECTION	COMMENT
		Options could also be presented which introduce issues about density (partially discussed on Page 102) and transport connectivity and how these considerations impact on the options available for where new housing should be developed (with different housing output data to show the effect on housing numbers of these considerations).
25	Key Options 2	These options appear to add little value and could be deleted.
26	Key Options 3	<p>This policy area is central to the development of sustainable communities and should be accorded greater significance. Achieving a balance between jobs and homes is a key part of the emerging South East Plan and as such, Options (b) and (c) will not be in general conformity with the South East Plan and therefore fail a key test of soundness.</p> <p>Option (a) should really be the basis of an objective for the Core Strategy, with options presented which outline how this will be achieved.</p> <p>Matters which need to be considered include options for making the regional employment hub of Ebbsfleet work, the extent to which out-commuting is being reduced (or not), the amount of employment land which is needed to achieve a balance (including consideration of river uses), and how jobs and new homes will be integrated (e.g. transport, location).</p>
32	Evidence Base	Throughout the issues and options report, it would be more useful to separate out background information from the critical pieces of evidence which will actually inform the preferred option in a substantial way. These critical pieces of evidence could then be used to explicitly justify the initial draft preferred options presented subsequently.
33/34	Key Options	Option (a) is obviously the only reasonable way forward but this option needs to be expanded to show how an 'appropriate balance' could actually be achieved. Presumably this will relate to new floorspace provision (quantity and type) and the balance between the various parts of the borough (e.g. Ebbsfleet, port areas, town centres).
38	Housing	The issues identified in this policy area do lend themselves to the approach being taken in the issues and options report and we therefore welcome the approach taken. We will however expect the final preferred option to be more clearly linked to and supported by evidence, particularly in relation to affordable housing matters.
44	Gypsies and Travellers	In relation to permanent provision and prior to the outcome of the South East Plan Partial Review in respect of provision for Gypsies, Travellers and Travelling Showpeople accommodation, local authorities should ensure adequate provision can be made within their local development framework for the accommodation needs identified within their respective Gypsy and Traveller Accommodation Assessments (GTAA).

PAGE	SECTION	COMMENT
		<p>To guide the Gravesham site allocations document the Core Strategy could usefully refer to the accommodation needs as identified in the GTAA. The Core Strategy should also set out reasonable criteria to help guide the site allocations document and any future windfall sites.</p> <p>The South East Plan Partial Review will include local authority pitch figures for the period 2006-2011 and also projected figures for the period 2011-2016. CLG guidance 'Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies' sets out an approach for projecting forward GTAA findings. These projected figures should be monitored and reviewed by local authorities.</p> <p>In relation to transit provision, Core Strategies should ensure adequate provision is made for transit accommodation where a GTAA identifies clear need.</p>
62	Background	<p>The background text refers to the need to consider 'where' additional retail provision should be provided. We welcome this as the critical consideration but it is felt that the options presented on Page 64 do not really explore the locational options available. Rather, Option 1a sets out the PPS6 sequential approach in a generic sense and leaves open the issue of provision 'elsewhere' if town centre and edge of centre locations are not available.</p>
64	Key Options	<p>Given the South East Plan Panel report and the position of Gravesham Council in relation to the retail role of Ebbsfleet, it is not considered that Option 1b is realistic.</p>
64	Key Options	<p>It is unclear what the consequences of this option are, how it relates to national and regional policy, and what value such an option adds to preparing the Core Strategy.</p>
63	Background	<p>The background text refers to Ebbsfleet and the reality that part of the development is in a neighboring authority and outside of Gravesham's control. The text then refers to the role of the Core Strategy as being 'a question of defining the Council's response to consultation'.</p> <p>It is considered that the LDF system requires a far more proactive approach to dealing with a regionally significant opportunity such as Ebbsfleet. This should therefore include close working with neighbouring authorities, as required in Test of Soundness 6, to ensure that the Core Strategy is consistent with neighbouring authorities where cross-boundary issues and relevant.</p>
80	Key Options	<p>The options for culture, leisure and tourism are very lengthy and quite difficult to understand. Some of the options also appear contrary to national and regional policy and are not really reasonable or realistic policy options. Further, these options do not convey a sense of what the strategy is for these policy areas and how they relate to other policy areas.</p>
90	Key Options	<p>It is considered that given the growth area status of this area, the Core Strategy could be presenting options for how (e.g. funding, delivery) the levels of growth proposed will be provided with community infrastructure and where / when such infrastructure is</p>

PAGE	SECTION	COMMENT
		required.
104	Key Options	We welcome the use of the design / density diagram as this helps non-planners engage with the subject matter.
104	Key Options	<p>It is difficult to see what value is being added to decision making and outcomes by the options presented for mixed uses vertically / horizontally and the public realm options.</p> <p>A more spatial approach would also be helpful here to assess what role design will play in the various parts of the borough. For example, option 1a proposed a major town square at a central location but the role of this square in wider terms (e.g. to drive regeneration in Gravesham Town Centre) is perhaps the more important issue and should be the focus of spatial options.</p>
104	Key Options	The options for the location of tall buildings are excellent as they potentially refer to actual places in Gravesham. The mapping of these places to give a geographic feel for where the potential locations are would enhance consideration of these options.
110	Key Options	Key option A for the historic environment is welcome and supported, and should be built upon as the Core Strategy develops to show how this will occur on the ground. Options B and C seem to add little value.
118	Key Options	The options for green infrastructure themselves add little value. However, the proposed green infrastructure priorities are quite good in that they outline what is actually going to happen.
128	Key Options	These options (in part) are fundamental to the development of the Core Strategy. How they relate to other policy areas contained in other parts of the report is unclear but it seems that where development will go and how it will be served from a transport perspective is one of the central themes of managing change in Gravesham. It is considered that its location on Page 128 of this document might diminish its importance to the overall strategy.
128	Key Options	Key option 1a needs to be fleshed out as to how these generic policy commitments, which are already contained in national and regional planning policy, are actually going to be delivered locally. Further, option 1b is neither realistic nor reasonable.
128	Key Options	The introductory words at the beginning of this response relate to key options 1, 2 & 3 and are not repeated here.
136	Key Options	<p>How the town centre transport options relate to, integrate with, and support other town centre options is unclear. It is difficult to consider town centre transport in isolation to other factors influencing town centre development.</p> <p>In relation to Options 1a and 2a, it is unclear why these factors would not apply to the whole borough and how they add anything to existing national and regional planning policy.</p> <p>In relation to Options 1b and 2b, these options are neither realistic nor reasonable.</p>
146 164	Key Options	Whilst the general discussion is welcome, there is a need to move beyond the general and outline how the Core Strategy could, should or will contribute to sustainable development in Gravesham.