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Our ref: GOSE 102/002/GRAV/CS
Your ref: LDF/CS I&O/MD

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Dear Mr Doyle

**CORE STRATEGY ISSUES AND OPTIONS CONSULTATION: Regulation 25
Town and Country Planning (Local Development) (England) Regulations 2004**

Thank you for your letter of 10 October inviting comments on the above consultation. It is clearly evident that you have undertaken a substantial amount of work in progressing the production of your Core Strategy and the comments below are intended to be helpful and constructive as you progress the document through the various formal processes.

The issues and options stage is an extremely important stage of plan preparation. Key to the success of the LDF system is 'frontloading' and the early involvement of the community and other key players. I understand that you have undertaken several public consultation exercises already in order to engage people at this early stage in the process. As well as engaging the community, it is also important that organisations, agencies (such as the Highways Agency and the Environment Agency etc), developers and land owners are involved early on in the process, and I would be interested to know of their involvement to date.

I am sure you appreciate that GOSE is not in a position to make detailed comments on the issues and options presented for consultation, but there are some general points that we would like to raise with regard to the form and content of the document as well as some key issues that should be addressed as the Core Strategy progresses to submission. It is key that you should produce a pro-active, deliverable and sustainable plan that is spatial/ place shaping and not produce an 'old style, topic based, reactive plan. The topic papers are a useful starting point but it is important that these are used appropriately in shaping the 'spatial strategy' for the Borough.

Under the new system, when scrutinising DPDs, we will look for clear evidence that the nine tests of soundness (as set out in PPS12, paragraph 4.24) are being addressed. At the early stages of production of the core strategy, we will concentrate on the overall soundness of the approach to document preparation. In particular, we will look for:



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- **Strategic thought and spatial vision focused on where and how an area will change and develop;**
 - What are the issues you are seeking to address?
 - What possible options are there for addressing these?
- **Flexibility / contingency and dynamic approach;**
 - Have uncertainties been considered and are there options to respond to changing circumstances;
- **Development of a robust and credible evidence base;**
 - The evidence base must be complete and comprehensive. It is the responsibility of the local planning authority to produce a sound plan, and a plan will not be deemed sound if the evidence base is incomplete or the information is out of date;
 - We should also remind you that we expect a full Strategic Housing Land Availability Assessment and not just an Urban Capacity Study.
- **Demonstrating proper consideration of options;**
 - A proper range of spatial options. At preferred option stage, the plan should set out why particular options were chosen. Have all reasonable options for dealing with the issues been explored? The preferred option/strategy (or strategies) should be clearly identified and fully justified. The evidence must support the approach favoured.
- **Proper testing of alternative options through sustainability appraisal;**
 - We are looking for testing of alternative locations and/or testing of alternative ways to develop areas;
- **A plan which can be implemented and monitored;**
 - In considering the development of your Core Strategy, you need to take account of the fact that Inspectors need to be able to establish whether the plan will work by being able to measure the policies/proposals. Will it deliver: what, where, when and how? Are the necessary delivery partners identified and engaged?
- **Appropriate coverage in a local context of important topics arising from Government guidance;**
 - We are not looking for repetition of national policy or the Regional Spatial Strategy in DPDs; rather, we want to see evidence that guidance has been addressed as part of the decision-making process and sustainability appraisal of spatial options, the broad locations selected for development and the broad locally distinctive approach to development at each location.

In preparing the core strategy, you should be aware that it is the document where the big decisions need to be made. Devolving these sorts of decisions to later on in other DPDs is



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not appropriate. The Core Strategy is the lead DPD and all lower level DPDs should conform with it.

The comments below relate more specifically to the consultation document, and you may like to take these comments into account when preparing future documents.

Document length and clarity

- Whilst it is important to have a comprehensive evidence base, the document is extremely long. The key issues and the alternative options being considered need to be very clear. A more concise document supported by appropriate background papers may have assisted peoples understanding of the key issues and options. The preferred options document will need to be expressed in more spatial terms and should be clear, succinct and easily understood in order to engage people into the process.

Stage of production

- My understanding is that this is a Reg 25 consultation (issues and options), yet the document refers to 'draft preferred options'. Preferred Options should emerge after considering the responses to Reg 25 consultation and not before. Whilst it is important that you include the outcome of the previous stages that you have completed, the document gives the impression that you have already decided on your chosen options which is not what is expected at this stage.

The Vision

- The document clearly indicates the need to have strong links between the Core Strategy and the Community Plan. This is an important test of soundness. Many of the issues listed are spatial and the Core Strategy will play a key role in addressing many of these issues.

Strategic/Spatial Objectives

- Alternative strategies should be explored at the issues and options stage. Whilst it is good that you have reflected the community strategy, the inclusion of the consideration of alternative strategies for delivery would have been advisable.
- The spatial strategy needs to shine through and say what is proposed, where and to what scale (distribution), when (trajectory) and how (place-shaping) and who with (partnership).

Options

- Some of the options put forward appear to be unrealistic. The Core strategy will need to take account of national planning guidance and be in general conformity with regional strategy. Whilst it is important to consider a range of options, these should be set within this overall planning framework. It would appear that some of the options would not pass conformity test iv. You need to demonstrate that you have tested all reasonable alternatives and your preferred option is the most appropriate in all the circumstances (soundness test vii, para 4.24 PPS12). Are there any options that you haven't explored? You will also need to demonstrate a clear trail of generation, appraisal, selection or rejection of all options at the examination of the Core Strategy. I



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appreciate that this can sometimes be difficult but, if a full range of meaningful options have not been tested early in the process, there is a risk that these will be raised at submission stage and potentially cause problems at examination.

It is important that you take account of the fact that the new system is 'evidence based' and the Core Strategy will be found unsound if you do not use an up to date and relevant evidence base to inform your decisions.

Sustainability implications

- Each topic has a section relating to sustainability implications. Does this represent a summary of a more in depth analysis against sustainability objectives or is it simply intended as a general statement?

Flexibility / contingency and dynamic approach

- We are pleased to see the inclusion of a section considering "what if" scenarios along with your strategy for addressing areas of uncertainty and your response to changing circumstances. I must emphasise that whilst we have looked through this section we are not providing detailed comments on the contents. We note that your assertion that your current allocation of sites exceeds the South East Plan figure by 743 homes but these sites are limited by flooding and transport infrastructure.

Gypsy and Traveller Accommodation

- We note your comments that the Gypsy and Traveller Accommodation Assessment looks at the period to 2011. It is for you to satisfy the Inspector that you will be able to ensure allocation of further sites, as needed, when the updated GTAA is completed. We expect that the Core Strategy will, in line with Circular 01/06 (ODPM): Planning for Gypsy and Traveller Caravan Sites (paragraph 31 and 32), set out the criteria for the location of gypsy and traveller sites to guide the allocation of sites. These criteria will also be used to meet any unexpected demand.

I hope that you feel these comments are useful in considering the way in which you choose to progress the Core Strategy. I would urge you to take full account of 'Local Development Frameworks: Lessons Learnt examining Development plan Documents' produced by PINS. This offers extremely useful guidance relating to all stages of plan preparation. We appreciate the work that you have undertaken so far and we will offer assistance, as appropriate, to help you through the process.

My colleague Joanna Andrews has been in contact with you and booked a meeting for us on Monday 10 December in order to discuss feedback and your intended approach to the next stage of preparation of the preferred options consultation. The intention is that we should address key issues/ areas of concern early in the process in order that progress can be made without any unnecessary delays occurring later on in plan preparation.

Yours sincerely



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LESLEY UNDERWOOD
Senior Planning Officer
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