

creating a better place



Environment
Agency

19 NOV 2007

Gravesham Borough Council
Cygnet House
132 Windmill Street
Gravesend
Kent
DA12 1BQ

Our ref: KT/2006/000116/CS-
01/IS1-L01
Your ref:
Date: 12 November 2007

Dear Sir/Madam

Core Strategy - Issues and Options

Thank you for your letter dated 10th October 2007, the EA would like to make the following comments on the above document.

Key Spatial Objectives

The EA welcomes that the environment is included in several of the Key Spatial Objectives.

SO1 – Delivering the major development sites

The EA would expect the LPA to make use of the SFRA when determining options for this objective and is pleased to see it mentioned here. We would also encourage the LPA to reduce the need to travel and make public transport an attractive alternative to private car use where travel is necessary. Please refer to our comments on the Kent Thameside Strategic Transport Programme and Tariff for a more detailed response to this issue. The EA would be opposed in principle to any development on marshland that had ecological value.

SO2 – Employment

The EA has no comments on this issue

SO3 – Housing

The EA has no comments on this issue as we have interpreted this objective to be related purely to housing types/needs.

SO3a – Gypsies and Travellers

The LPA should be aware that the EA has a policy of objecting to planning applications for mobile accommodation in the flood plain due to the increased risks in the event of a flood should the accommodation be dislodged and moved in flood



waters. This not only presents a risk to occupiers but also the public, emergency services and infrastructure such as roads and defences. Even if flood mitigation is proposed, we would still object to occupation over the winter months when the risk is greatest.

SO4 – Retail

The EA has no comments on this issue.

SO5 – Culture, Leisure & Tourism

There appears to be very little mention of outdoor leisure pursuits in this section such as angling, walking, sailing etc. The EA would encourage the LPA to explore these areas further as enhancements for leisure and tourism can also be of great benefit to the environment if designed and managed correctly.

SO6 – Community Infrastructure

The EA would advise the LPA to consult Table D2 (Flood Risk Vulnerability Classification) of PPS25 when considering options for this objective as buildings such as Community Centres are often utilized by displaced residents in times of emergency.

SO7 – Built Environment

The EA would encourage the LPA to follow the guidelines within the Kent Design Guide, particularly in relation to drainage. We would also recommend that the LPA investigate the use of “green and blue” open spaces and grids as they can provide valuable habitat for wildlife as well as providing amenity and public realm.

SO8 – Heritage & Historic Environment

The EA has no comments on this issue.

SO9 – Green Infrastructure

The EA would wish to see the LPA champion improvements to the green *and blue* infrastructure and open spaces to support the regeneration of the area. Green and blue infrastructure and open spaces need not effect the implementation of other agendas such as biodiversity enhancements, landscape improvements and sustainable flood risk management as they can easily work with and enhance these areas if designed and maintained correctly. The EA would, of course, be more than willing to advise the LPA further on these areas if required.

SO10 – Transport & Air Quality

We would encourage the LPA to reduce the need to travel and make public transport an attractive alternative to private car use where travel is necessary. Please refer to our comments on the Kent Thameside Strategic Transport Programme and Tariff for a more detailed response to this issue

SO10a – Town Centre

The EA has no comments on this issue.

SO11 – Climate Change

The EA would expect the LPA to adopt a proactive approach to climate change, sustainability and the use/production of renewable energy and welcomes the LPA's recognition that the borough will face real challenges from climate change such as rising sea levels and resultant increased flood risk. The EA would encourage the LPA to set more definite targets within this objective, such as using the Code for Sustainable Homes to indicate what level they will expect developers to meet. For

reference, the EA currently advises developers that we will expect them to reach at least Level 3.

SO12 – Flood Risk

The EA welcomes that the TE2100 project has been acknowledged. We also welcome that the LPA intends to adhere to the guidance in PPS25 and utilise the sequential and exception tests at a strategic level. We would, however, take this opportunity to remind the LPA that individual developments must still be shown to be 'safe'. The EA may therefore still object to a planning application if the submitted FRA cannot do this.

The EA is pleased to see that 94% of the respondees to the 'Future of Gravesham' leaflet noted the importance of setting back riverfront development to allow for future upgrading of the flood defences and we hope the LPA will act on this.

SO13 – Water Supply & Water Quality

We would advise the LPA that the EA considers that the potable water supply and waste water treatment capacities can only support the proposed levels of growth *if the necessary improvements and efficiencies are delivered*. The LPA may therefore wish to consider what will happen if these necessary works are not delivered or severely delayed.

SO14 – Thames Riverside

The EA is not opposed to the principle of improvements to access and facilities for river dependant uses, but this must not result in net loss/damage to the riverine environment and/or defences. Any proposals that involve the riverfront should be discussed with the EA at the earliest opportunity as it may be necessary to construct mitigation/compensation packages following surveying. Land Drainage Consent will also be required from the EA, in addition to planning permission, for any development that falls between the point of low tide to a point 15metres from the landward toe of the defences. We would welcome proposals that restore/enhance watercourses, such as un-culverting.

SO15 – The Countryside

The EA welcomes that the LPA has acknowledged that an area can still be of ecological importance even if it is not 'designated'.

SO15a – Culverstone Valley Area

The EA has no comments on this issue.

SO16 – Rural Settlements

The EA has no comments on this issue.

Yours faithfully



MISS MICHAELA KENNARD
Senior Planning Liaison Officer

