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Your ref: P/GR/4
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Date: 20/11/07

Dear Sir/Madam,

Gravesham Borough Council Local Development Framework Core Strategy – Key Issues and Options Consultation

Thank you for your letter consulting the County Council on the Key Issues and Options Core Strategy.

Given the current transition in the planning process Kent County Council is concerned that the thrust of strategic policy, currently contained in the Kent and Medway Structure Plan 2006, is secured for the longer term where it remains relevant, is applicable to the Gravesham area and where it may not be fully addressed through the successor policies of the South East Plan. The Adopted Kent and Medway Structure Plan 2006 will "still be a material consideration and will remain part of the development plan until superseded by the Regional Spatial Strategy" (paragraph 4.22 PPS12). The Structure Plan identifies a number of issues as needing to be addressed by Local Development Documents.

The County Council notes and welcomes the extensive reference to the KMSP as part of the policy basis for the Core Strategy. It also notes the cognizance taken of the Kent Minerals Development Framework and particularly its policies and proposals relating to the safeguarding of Thames wharfage and mineral import points.

To assist with LDF preparation, Kent County Council's Adult Services have prepared a briefing note setting out what they would like to see as part of Core Strategies. Please find this attached at Appendix A. An updated version of "Active Lives" is also available.

Leigh Herington: County Planning Officer

Please also find a service provider statement relating to education attached at Appendix B. The statement provides a context for the provision of education services in Gravesham and should form part of the LDF evidence base and be used in LDF preparation. At this time the implications for land disposals of the Building Schools for the Future programme are unclear.

Specific Comments on the Key Issues and Options

General

While the sustainability implications of options are briefly explored, the CPA look forward to a full sustainability appraisal with the preferred options document to enable the full impact of options to be assessed.

Community Strategy

The Core Strategy refers to the links between Community Strategies and LDFs but does not specifically refer to the Kent wide Community Strategy 'Vision For Kent, 2006 and supporting documents, such as Kent Prospects and the Kent Environment Strategy. This link needs to be strengthened as Vision for Kent 2006 should inform the policy context of the LDF.

A number of issues are identified on page 8 and 9 that are suggested as reference points for moving the Borough forward. It is unclear whether these points are taken from the Community strategy (and if so, whether this is the original or updated strategy); if they are, a date and title of the publication would be helpful.

Amendments which could be made to the list of key issues include:

- Page 8 - Suggested amendment to from the title of "Health and Well-Being" to "Health, *Social Care* and Well-Being";
- Community should be added to the list on page 8, as it is referred to as a separate heading on page 13;
- Page 10 – a reference to libraries under lifelong learning should be included, given their role in supporting this agenda through developing skills, helping people seeking employment and widening participation in learning through information provision role.
- Page 11 – community infrastructure is not identified as a key issue. A bullet point could be added, stating "promote sustainable developments by ensuring the necessary community infrastructure is provided"; and
- Page 12 - the bullet point relating to diversity should read "protect, *maintain* and enhance the quality and diversity of Gravesham's countryside".
- Page 12 – amend the title of health and well being to "Health, *Social Care* and Well Being";
- Page 12 – first bullet point should be amended to read "work with the Dartford, Gravesham and Swanley PCT, *Kent County Council* and other partners....to develop a Public Health and *Social Care* Strategy for the Borough";
- Page 12 - Dartford, Gravesham and Swanley PCT is now known as West Kent PCT.

Vision

Core strategies are supposed to establish a vision for how an area will look in twenty years time with the spatial objectives providing a sense of how the vision is to be achieved. The

only vision set out is taken from the Kent Thameside LSP vision and it is unclear to what extent this represents the vision for the Core Strategy.

Key spatial objectives

The key spatial objectives are supported although some amendments could be made for additional clarity:

- SO1 – add in a bullet point to reflect the role of infrastructure provision in sustainability: “by promoting sustainable developments by ensuring the necessary community infrastructure is in place”.
- SO6 – add in a new paragraph stating
“to ensure that new development will be assessed in terms of its community infrastructure needs and will only be approved if the infrastructure and services it requires are identified, and an undertaking of its provision is provided. A development will not be permitted until the necessary infrastructure to serve the development is available or will be provided in time and contributions from developers will be required where appropriate.”

Strategic Objective 1 – Delivering major sites (page 19 et seq)

Objective should have additional bullet point: “by promoting sustainable developments by ensuring the necessary community infrastructure is in place”.

KMSP policies QL12 and IM1 should be added to the policy basis of this section to reflect the need for adequate infrastructure provision. As issue 1 suggests that flooding should be a determinant of the urban pattern, KMSP Policy NR10 (Development and Flood Risk) should also be included within the policy basis.

The County Council broadly supports the network of major development sites identified in the Issues and Options document.

Certain of the major development sites referred to contains mineral sites such as wharves/import points. Please see appendix C for specific comments relating to these matters which should be reflected in the core strategy.

On Key Option 1 the KMSP establishes a sequential approach in policies SS4 and HP2, which, for instance, gives priority to the development of brownfield land over greenfield land. Policy NR10 sets out considerations to be taken into account regarding development and flood risk. In light of this policy framework option 1a is supported.

Regarding Key Option 2, option a) is preferable. Mixed use developments are supported in Policy QL5 of the KMSP and policies SP1 and TP1 make reducing the need to travel a key criterion for the location and form of development. This is supported by policy TP3, which requires local authorities to ensure that development sites are well served by means of transport other than private car.

On Key Option 3 the balance intended between housing and employment on the major sites is not spelt out in terms of the implications for employment and economic development arising from the strategic housing provisions proposed for Gravesham and associated labour market

change. There are no strategic 'markers' for the scale of business/commercial floorspace provision or jobs or the role of the major locations. For those major sites where planning permission has not already been granted a role for the Core Strategy will be not only their identification as prospective strategic sites but also the mix and balance of development envisaged for them including their contribution to strategic housing and economic development provisions.

Strategic Objective 2: Employment

Option a) under the Key Options is supported in terms of the way forward on employment structure and there is well established strategic policy support for Ebbsfleet's role as an employment hub (KMSP Policies DG1/ EP4 and emerging South East Plan Policy KTG4). The importance of maintaining a balance of uses at the riverside, including maintenance of wharfage (policy MN4 and emerging Minerals Development Framework), is supported (see also appendix C).

The objective refers to the development of the local skills base but no reference is made to the land use implications of this other than a mix of jobs; does improvement of the local skills base have any additional land use requirements which should be reflected?

Spatial Objective 3 - Housing

Amend the objectives (page 38) in two ways:

- from "...subject to provision of adequate supporting highway/other infrastructure..." to "...subject to provision of adequate supporting highway/*community* facilities and other infrastructure..."
- from "...through the delivery of a broad range of affordable and special needs housing in a suitable range of tenures..." to "...through the delivery of a broad range of affordable, special needs and *lifetime* housing in a suitable range of tenures...."

Policy Basis –the following references should be added:

- Kent & Medway Structure Plan policies QL12b and IM1
- Government White Paper 'Our Health Our Care Our Say' (DH, January 2006)
- Active Lives 2007-2016 (Kent County Council) - 'every person should have the support to live independently in their own home or community if they want to.'
- "Seeds of Change 2: A vision and outline for Health Services in Dartford, Gravesham, Swanley and the Sevenoaks northern parishes 2003 – 2016" – Dartford, Gravesham and Swanley Primary Care Trust 2004.

Key Option 1

Option (a) is supported – KMSP Policy HP4 encourages a range of densities and policy HP6 establishes that a range and mix of housing should be developed, including sheltered accommodation and supported and lifetime housing. The design of housing to conform to the Life Time Home standard is important at a time of an increasing elderly population and enables people to remain in their own homes.

Within the framework of the strategic housing provision for Gravesham the Issues and Options paper does not provide a clear summary of the broad spatial distribution of housing envisaged e.g. the role of the town centre, the major development sites (collectively or individually) the remainder of the urban area and the rural area south of the A2. There is also no indication of likely phasing /delivery over the 20 year period.

Key Option 2

The 30% target for affordable housing within the urban area is considered appropriate as is the principle of a differential target and site size threshold to be applied in the rural area. However given the high proportion proposed for the rural area (50%) and the 2 unit site size threshold it should be recognised that there may be circumstances where investment in other services /infrastructure, supported by contributions from development value, may justify a more flexible application. However, KMSP Policy HP7 (and South East Plan Policy H4) encourages development plan documents to identify the contributions of different types of affordable housing to the overall requirement, for instance shared equity, key worker and other forms of intermediate housing. This is not addressed.

Spatial objective 3a – Gypsies and Travellers

As acknowledged in the document SEERA is currently preparing a partial review of accommodation of gypsies and travellers and this work, and the options it contains should inform the options in the core strategy, particularly with regard to pitch requirements. Reference is made to this work not being finalised until 2010 but proposals are due for submission before the end of 2008. It should be noted that the RSS review is intending to address pitch provision over a ten year period and not for the full period covered by the LDF as is suggested on pages 48 and 52.

The preferred options identified in relation to permanent pitch provision, transit site provision, the approach to locating permanent pitches and size of site are all supported.

Spatial Objective 4 - Retail

The KMSP establishes a strategic retail hierarchy, which recognises Bluewater as a regional centre and Gravesend as a principal town centre. Policy EP15 sets out a sequential approach to retail development, which prioritises those areas identified in the hierarchy and criteria for consideration when out of centre development is proposed. A broader role for Ebbsfleet in terms of retail and leisure is not recognised in the KMSP, either in EP14 or DG1. In light of this policy framework, option 1a is supported as being consistent with the KMSP retail and service centre hierarchy as well as the provisions of draft South East Plan Policy KTG8.

Where otherwise justified expansion of existing retail warehouse floorspace adjacent to existing provision has clear advantages in terms of facilitating multi purpose trips. These advantages are emphasised given the proximity of Imperial Business Park to the town centre.

Spatial Objective 5 – Culture, Leisure and Tourism

Under 'Policy basis 'KMSP Policy EP12 should read tourist accommodation, not tourist attractions.

The role of the libraries in culture, leisure and tourism could be recognised under key options. The town centre library helps to attract people to the town centre and co-locating this with other services may help to increase footfall.

The provision of community facilities at Meopham Community School is supported where possible.

Option A is supported. As with retail, Policy EP15 of the KMSP creates a hierarchy for leisure uses which establishes a sequential approach to leisure provision with a focus on provision according to the strategic hierarchy in policy SS1.

Spatial objective 6 – Community Infrastructure

The definition of community services used should reflect the definition of community infrastructure used in KMSP QL12 - "community services includes schools and other education provision, social services, adult education, libraries, youth and community services, health, culture, places of worship, recreation and amenity space, sport, local shopping, public utilities and transport". This definition should be used throughout the text, for instance in the background section.

Additional references that could be included in the policy basis section include South East Plan policy CC5 iv) and Kent and Medway Structure Plan Policy DG1.

"KCC Guide to Development Contributions and the Provision of Community Infrastructure, 2007" should be added to the evidence base.

An additional clause could be added to the end of the first paragraph under key issues - "and in this regard consideration may be given to the pooling of development contributions will be pooled from several small developments where required, to provide community infrastructure and services."

Page 88 - Suggested addition to text after the end of the first paragraph "Investment in new community infrastructure..." add in - "the Core Strategy will have regard to and take account of likely changes to the strategies of service providers."

Paragraph beginning "Gravesham has a wide range..." - Suggested amendment to text from "...School buildings can be expanded to create additional access for the community..." to "the use of school buildings *may* be changed to create supplementary provision for community use". Please see point vii) below for further details.

Add "therefore, new developments may require the relocation of existing community facilities to more appropriate sites" to the sentence beginning "Investment in new public transport infrastructure..." to reflect the need to locate facilities in accessible locations.

Under responses to previous consultations it is noted that one comment was the need for improved library services. The library service has aspirations to improve facilities in the town centre and at Kings Farm and Marling Cross.

Key Option i) Provision of community infrastructure

Option A is supported. QL12 requires infrastructure to be provided to accommodate additional requirements for local community services arising from new developments or growth in demand from the community. QL12 offers a definition of community services, covering "schools and other education provision, social services, adult education, libraries, youth and community services, health, culture, places of worship, recreation and amenity space, sport, local shopping, public utilities and transport".

The terms of this option do beg the question of how such provision is to be supported i.e. what policy mechanisms are to be deployed. Whilst elsewhere in the document there is reference to the strategic transport tariff proposals there is no indication in this section or elsewhere as to whether a 'planning charge' approach is being contemplated or, if not, why it has been discounted. This is also pertinent to Key option iii below,

Key Option ii) Retention of Community Infrastructure

QL11 states that existing community services and recreation facilities should be protected "as long as there is a demonstrable need for them". A hybrid of Options A and B is therefore supported, where planning permission which results in the loss of a *needed* community facility or service should normally be refused.

Key option iii) New Development and Community Infrastructure Provision

Policy IM1 allows for contributions to be sought from developers towards the cost of providing necessary infrastructure arising from the needs of the development. However, the scope of IM1 goes beyond major developments and covers all development which reaches a designated threshold (for KCC services this threshold is established in the "KCC Guide to Development Contributions and the Provision of Community Infrastructure, 2007"). Thus, while option A is supported, this could be expanded to indicate the scale of development envisaged as 'major'.

The draft preferred option also alludes to the South East Plan references to the need for clear guidance on the role of development contributions towards infrastructure. For its part KCC has produced the "KCC Guide to Development Contributions and the Provision of Community Infrastructure, 2007".

Additional points which could be addressed in this section include:

- Where a development creates a service need which requires land, building etc. they will be provided at nil cost to the Service Provider.
- The need for facilities to support the population to be provided early in the development process.
- If and when a developer, third party etc. seeks to deliver the infrastructure or service this should be subject to the approval of the Service Provider (who must be involved throughout the whole process) and must be fit for purpose.

Key Option iv – Health Impact Assessments

Whilst Option A is supported this might benefit from some clarification as to the scale and types of development where this requirement would kick in.

Key Option v) Location of Community Facilities

KMSP policy QL12 provides for infrastructure to be located where it is accessible by walking, cycling and public transport from the area which it is serving. Whilst accessibility is a key locational criterion for the location of community facilities location should also have regard to the pattern of need and to their contribution to living communities. For instance, a school may be best placed to serve the population in a residential area as opposed to located in a local centre. A pragmatic approach depending upon the service is required and there needs to be flexibility to recognise new patterns of service provision.

Key Option vi) Provision of community facilities as part of mixed-use development

QL12 encourages the provision of facilities "within new residential, commercial and mixed-use developments". In light of the requirements to ensure that such facilities are accessible to its users, option A should be supported.

Key Option vii) School sites

There are two elements to the expansion of school sites for community uses; firstly, physical expansion of the school and secondly, expanded uses within the existing buildings. The first of these is problematic as there is a lack of funding to expand schools for community uses; the primary use for school buildings remains educating students and schools cannot be expanded physically without an increase in student numbers. Schools sites are also often physically constrained in terms of expansion. Whilst the second option may be more attractive, a governing body can only be encouraged to run community facilities from a school site. Option A which states that the use of school buildings should be expanded is therefore difficult to implement and would be better phrased as "the use of school buildings may be expanded".

Key Option viii Utility Services

A definition of what is covered by the term 'utility services' would be helpful.

Spatial objective 7 – Built Environment

Whilst the KMSP is recognised along with the Kent Design Guide in the evidence base section, it should also be referenced in the policy basis section. Relevant policies include QL1 (Quality of design and development), QL3 (movement and accessibility in the public realm), QL6 (Conservation areas), and QL8 (buildings of architectural or historic interest).

Spatial objective 8 – Heritage and Historic Environment

Gravesend library is a listed building and the library service has aspirations to improve and enhance the building.

The Public Rights of Way (PROW) network also has a role to play in heritage terms as it represents a memory of movements and activities of people, forming a historic asset.

Spatial Objective 9 – Green Infrastructure

The KMSP is supportive of the provision of a green grid through Kent Thameside, reflected through policies DG1 and QL17. Discussion in paragraph 3 on page 121 regarding the creation of a framework in the core strategy, and the recognition of the importance of green space in the sustainability implications section, is particularly welcomed. It would seem appropriate for the Core Strategy to include, via its Key Diagram, a structural representation of the Green Grid and its relationship with the key strategic sites.

Paragraph 5 on page 121 states that "the requirement for new development to contribute toward the enhancement of green infrastructure, either by way of s.106 contribution or in kind". This approach is broadly supported. However, in cases where facilities at KCC school playing fields may be reduced in area, but are being improved with the full support of the DfES and Sport England, KCC would not expect to provide off site replacement facilities and land.

Major sites should also ensure that they contribute to local access improvements for example the Thames Path (city to sea project) which is referred to in the section on Thames Riverside (S014). KCC wishes to progress the aims contained with the recently completed Countryside Access Improvement Plan (CAIP) and is concerned to promote the protection and enhancement of the Public Rights of Way network. Whilst this has its own statutory regime local planning policy support is very helpful in both protecting the network and, through new development, negotiating enhancements to it. KCC is committed to securing enhancements to the whole network of routes and paths available to the public, of which the PROW network is an important but not exhaustive part.

The contribution of the green infrastructure network to protecting and enhancing biodiversity could be given fuller recognition. Where accessible green spaces, such as parks, are developed these should be linked to the green grid wherever possible. Provision of green space should incorporate different habitats to increase biodiversity, such as areas of rough grassland, ponds and wetlands and increased shrub and woodland.

Spatial Objective 10 – Transport and Air Quality

The Local Transport Plan should be recognised in both the policy basis and evidence base.

KMSP TP1 outlines that the priorities for transport will include the promotion of a pattern and form of development that reduces the need to travel and is served by a choice of means of transport. This is supported by TP3 which requires new developments to be accessible by a range of transport. Key Option 1a is supported although a direct reference to walking and cycling would be beneficial.

Key Option 2a is supported but see comments above regarding interpretation of balanced housing and employment growth.

It is not wholly clear from the initial draft preferred option and rationale section what the draft preferred options of the council are at this time. The inference would appear to be that the (a) options are preferred throughout.

Spatial Objective 10a – Town Centre: Transport and Major sites

The Local Transport Plan should be recognised in the policy basis as well as the evidence base section.

The Vehicle Parking Standards SPG (SPG4) should also be listed in the evidence base.

A map showing the location of the Transport and Heritage Quarters would be helpful.

Again the 'initial draft preferred option and rationale section' is expressed in open ended terms and does not identify clear preferences for the Key Options identified.

Whilst the criteria suggested in Key Option 1a are supported their implications for the 'modus operandi' of the traffic management and circulation in the town centre will need to be spelt out.

The comprehensive approach to the Transport Quarter (Key Option 2a) is supported although it is noted that further feasibility work continues. Will this be in place to support the evidence base for the Core Strategy Preferred Option and subsequent stages?

The emerging preferred approach of the Core Strategy towards car parking provision and standards needs further definition including the case for more stringent standards in, for example, the town centre and /or locations (including the major development sites) benefiting from good/improved accessibility as a consequence of the Fastrack network.

Key Option 4 a for the Heritage Quarter is supported.

Key Option 5 a for the Imperial Site is supported.

It might be helpful to draw together the options for strategic transport improvements that flow from the emerging spatial strategy of the LDF, notably future Fastrack links (and their relationship with the wider network), the enhanced town centre public transport interchange and highway infrastructure required to support growth and regeneration in the Canal Basin/North East Gravesend and to potentially provide associated benefits for traffic movement and circulation around the town centre.

Spatial objective 11 – Climate change and renewable energy

Both the KMSP and the draft South East Plan encourage sustainable construction techniques and standards and the national backcloth of policy and guidance has evolved substantially over the last year or so. The document is right to acknowledge (page 147) that local planning policy should not presume to exceed phased and challenging national standards implied, for example, by evolution through the Code for Sustainable Homes. Nonetheless the concentrated opportunities for growth and regeneration may offer exceptional opportunities for securing carbon footprint reductions and the (Kent Thameside) commissioned study on Sustainable Energy Generation could and should prove important to the necessary evidence base in this regard.

The pro active option b is supported.

One additional element that could be included within option b is maximising opportunities for non-vehicular transport such as walking and cycling in and out of existing and new development.

Spatial Objective 12 – Location of new development and management of flood risk

Key Option a is supported as being the most compatible with the higher level planning framework for Kent Thameside identified through the KMSP and South East Plan. In taking forward the major development (strategic) sites it will be important to understand and demonstrate the implications of flood risk for the mix of uses to be accommodated and associated broad development capacities.

The KMSP establishes a sequential approach to identifying land for development, prioritising previously developed land over greenfield land (Policy SS4). Development should be planned to avoid flooding and should not be permitted if it is subject to an unacceptable risk of flooding or would adversely affect flood defences (policy NR10). Option a is consistent with this strategic policy framework. NR10 also encourages the submission of flood risk assessments with all applications and this should be reflected in the core strategy.

Spatial Objective 13 – Water supply and water quality

The pro-active approach of Key Option b is supported as building appropriately on Policies NR1 of the KMSP and CC4 of the draft South East Plan.

Spatial objective 14 – Thames Riverside

Regeneration of Thames Riverside sites should be consistent with the policies outlined in the policy section, particularly those in the emerging Minerals Development Framework. For more information on this, please see Appendix C.

The regeneration potential of the Riverside is fully recognised and supported but there is also important strategic policy guidance safeguarding the role of the River frontage for mineral handling and importation especially where associated with deep water berthage. In this regard the detailed configuration and mix of proposals that emerge for Northfleet Embankment (East, Central and West) will be important and mutual compatibility with the emerging Minerals Development Framework will need to be demonstrated. The strategic planning objectives for the riverside will need to recognise the river's role.

Spatial Objectives 15 (The Countryside) and 16 (Rural Settlements)

While section 15 nominally concerns the countryside and countryside protection, and section 16 addresses rural settlements, both sections focus on the same overall issue, namely development in the rural area. It may be appropriate to amalgamate these two sections into one section concerned with both development in rural areas and countryside protection.

In section 15 there appears to be very little discussion as to the level of protection that would be afforded to different designations. The distinction drawn between areas' strategic and local landscape importance will need to be reviewed once the strategic planning work of the KMSP (Policy EN5) is superseded by the South East Plan. The latter neither designates nor supports the identification of strategic /sub regional landscape designations.

KCC's Countryside Access Improvement Plan should be added to the evidence base section. GBC are working in partnership with KCC to improve the PROW network for Gravesham residents, in accordance with the Countryside Access Improvement Plan, and this should be

referred to in the core strategy. Additional points which could be incorporated in the core strategy include the addition of the need to protect and enhance the PROW under the countryside.

The KMSP establishes a strategic hierarchy for development where development should be concentrated at the main urban area or, in rural areas, at Rural Service Centres. Outside of rural service centres, development may be permitted at smaller rural settlements where they benefit from good road and public transport access and have an existing core of employment and community services, and such development is identified in Local Development Frameworks. Development outside the confines of a rural settlement should be small scale and identified in LDDs or supported by a special local justification (Policy SS7). Policy SS8 and HP5 set out the criteria for non residential and residential development in the countryside respectively. Key Option 1a is preferred as being most coincident with this policy approach.

For Key Option 3, option a is supported in more fully and appropriately reflecting the intent of preceding policy (e.g. KMSP Policy EN11) for local planning authorities to work together to develop and implement strategies for the enhancement of landscape and urban character, provision for access and recreational networks, and habitat management and enhancement within urban fringe areas.

"Key issues" of section 15 considers the various countryside designations to be afforded protection under the core strategy and the CPA look forward to more detailed wording on these matters in the Core strategy to take forward KMSP policies EN1, EN3, EN4, EN5, EN6, EN7 and EP9.

Section 16 adds some spatial dimension by identifying the rural settlements in the Borough and considers the different options for development at these settlements. However, all three options may be appropriate in different circumstances. Analysis of the characteristics of these settlements should be undertaken to identify larger and smaller settlements as the appropriate level of development is likely to vary depending on the settlement's characteristics.

Spatial objective 15a – Culverstone Valley Area

No comments.

Biodiversity

Please see appendix D for specific comments relating to biodiversity.

Yours sincerely



Dick Feasey
Planning Policy Manager

Appendix A: Social Services for Adults - Issues for Local Development Framework Core Strategies

Introduction:

KCC's Adult Services Directorate provides the full range of social services to adults – ensuring that people's needs are identified and that they are supported to live their lives in the way they want. The Directorate supports older people, and people with physical or sensory impairment, learning disabilities, or mental health problems. Its overall objective is to help the people of Kent to live safely and independently in their local communities.

Context/Background

The population is ageing – there will be more older people needing support to live independently. Alongside this the number of people with physical or learning disabilities or mental health problems is growing due to improved medical care and demographic trends. Older people and those with impairments (of all kinds) want to live in their own homes within the community, and be part of community living, just like everyone else.

We want to move away from institutional day care, and enable disabled people to participate in employment, learning and leisure within the community. With older people too, we want to support them to remain in their own home whilst participating in community life.

The LDF should positively promote independent living for disabled people of all ages.

How independent living can be promoted through the LDF

The vision for independent, community living requires a network of community facilities with which to support those who need it. The precise nature of these can vary enormously – voluntary sector 'drop in' centres; purpose-built village halls; health and social care centres; community schools – but healthy communities cannot exist without accessible and suitable places for people to gather and socialise, learn or work. This infrastructure therefore helps to build healthy, inclusive, communities within which the voluntary sector can flourish.

The Lifetime homes standard should be implemented for all housing – it doesn't only benefit people with disabilities, but makes life easier for families too. There is strong evidence for this.

Vision

Our vision¹ is to move over time from "institutional" day care to more flexible ways to help keep individuals in their own communities. This means:

- Taking opportunities to support people in using existing facilities within the community such as local leisure centres.
- Developing smaller more local services on the basis of a hub and satellite model, a central management hub supporting several units in identifiable neighbourhoods.
- Providing local solutions for people, particularly those with a disability, who currently have to travel long distances for day care or short breaks.

¹ Our vision is set out in a document Active Lives which is currently under consultation. A copy is included with this response.

- Maximise the time that older people can be supported in their homes/communities to avoid the disruption of hospital or care home admission
- Developing employment opportunities through social enterprises or links with local firms to reduce the dependency of individuals on benefits and increase their self-esteem.

Key to supporting this vision are:

- The availability of effective and economic local transport services.
- A sound and thriving voluntary sector infrastructure.
- Upgrading of the accessibility of local facilities with provision for users with sensory & physical disabilities and a positive approach to disability in new developments.
- Availability of new homes built on the Homes for Life principle and existing housing stock that can be readily adapted to the needs of people with a disability.
- With a particular focus on those with special needs we would advocate toilet facilities that meet the Changing Places specification both within key communities and in services such as leisure centres.
- Availability of affordable housing which is particularly relevant in attracting care workers to a District as the sector is reliant on relatively low paid staff.
- The provision of primary care health services local to service users.
- High quality community facilities in neighbourhoods accessible to all.

Developer Contributions

To support this work we have developed a specific formula related to new housing developments that identifies the capital needs of our services. We will be seeking to request Section 106 capital against this formula where we need to build or upgrade buildings to meet the service needs of the District's population.

Independent sector developments

We would particularly like to be consulted when providers seek or are exploring consents to develop residential or nursing care including sheltered housing schemes within the District. We have a range of knowledge and expertise that will contribute to the consideration of whether such a development is valuable or might place further demands on services within the District.

Specific Issues:

We would particularly like to be consulted when providers seek or are exploring consents to develop residential or nursing care including sheltered housing schemes within the District. We have a range of knowledge and expertise that will contribute to the consideration of whether such a development is valuable or might place further demands on services within the District.

Appendix B: Service Provider Statements For Local Development Frameworks

EDUCATION

Comments can be broken down into two main categories:

1. General Strategies
2. Specific plans and proposals.

1. General Strategies

These include:

Impact of falling birth rates

- Over the ten years from 1991 – 2001 the number of primary school children in Kent rose from 99,900 to 113,700. Following this, the numbers started to fall away and are expected to reach a trough in 2010, of around 106,000. Numbers of pupils are then expected to recover.
- The impact of this has varied between districts, with areas such as Ashford, Dartford and Gravesend suffering less than other areas, due to the amount of house building carried out over a period of time. Other districts such as those in the eastern part of the county (Dover and Thanet for example) have showed a consistent fall in the numbers of primary pupils coming forward.
- This has led to the implementation of the Kent Primary Strategy 2006 which gives guidelines as to the preferred shape of primary provision in the future, including:
 - Primary schools should not fall below 100 pupils or it becomes difficult to sustain four classes.
 - Four classes is the lower size limit for a sustainable school.
 - Any proposals for closure should take into account the capacity of a school to provide effective educational and social provision for each child.
 - Any considerations to reduce the numbers of schools in any area should consider whether they serve the community in which they are sited, whether the community can sustain them, their physical condition and ability to deliver a full range of curriculum and social experiences.
 - Where excess space is generated by falling rolls, provision of extended schools, community and/or early years and childcare facilities should be given priority consideration.
 - Capital receipts generated from redundant school sites should be reinvested in other education or community facilities locally.
 - All-through primary schools, rather than separate infant and junior schools are generally preferred and amalgamation will be considered for separate infant and junior schools whenever it is known a head teacher is about to leave.
 - New schools should be planned to have either seven or 14 classes. Any school built as 1FE should, if possible, have a site capable of development to 2FE, and built with infrastructure that can be added to easily.

For the full document go to: [Kent Primary Strategy 2006](#)

Since 2006 this has led to the development of proposals to address the issues of surplus places and a number of schools have reduced in size, amalgamated or, in a few cases, closed. The Kent Primary Strategy 2006 will continue to shape how primary schools develop for some years to come.

- In some districts and boroughs the fall in numbers generally has been counterbalanced by house building and this has meant the re-ordering of provision, with the removal of provision in some areas and the addition of provision in others, usually where new housing has warranted it.

Special School Review

This is an ongoing programme of review and redevelopment and will have different implications for different Districts, depending on what is proposed for specific schools. There is a focus on assessing the changing needs of pupils and re-designating schools where necessary. There may be some enlargement projects, relocations and sale of sites.

Building Schools for the Future (Secondary)

- This is a major strategy for the improvement (refurbishment or complete rebuilding) of every secondary school in the county. Again, schools will be individually assessed as to what they need, but Districts will come forward at different times over the next 10-15 years.

- Waves are phased as follows:

Up to 2014 – Gravesham, Thanet, Swale

Up to 2016 – Dover/Shepway, Canterbury, Ashford

Up to 2021 – Dartford/Sevenoaks, Maidstone, Tonbridge/Tunbridge Wells

- The focus of this programme is the transformation of the secondary estate through the rebuilding and refurbishing of existing schools. It is required that a "transformational approach" to design be taken and that groups of schools are assessed together to ensure the appropriate levels of provision are provided.
- Primary Capital Programme – A recently announced Government initiative to refurbish / rebuild half of the country primary stock from 2009 onwards. A transformational approach is required. Unlike BSF, this will be applied across the county and will focus on areas of deprivation first. The programme may include a wide range of approaches including rebuilding on the existing site, through to smaller scale refurbishments.
- Academies – A number of academies have been created or are proposed for Kent. These include:
 - Marlowe, Ramsgate
 - Folkestone Academy, Folkestone
 - The Spires, Canterbury
 - The Marsh Academy, New Romney
 - New Line Academy and Cornwallis Academy, Maidstone

These will take the form of substantially rebuilt secondary schools, but when open will be independent of the Kent LA. Further academies may be considered in the future.

- Nurseries – The KCC is committed to increasing the number of LEA school-based nurseries in the county. These should be located in the areas of highest deprivation and will be run as part of the schools they are located with – providing half-day sessions for children, five days a week. In addition, many private nurseries exist on school sites, but as separate entities. (Reference “Ten Year Strategy for Childcare – Guidance for Local Authorities” 2005). *This programme now completed. Full day care now a more pressing area.*
- Children’s Centres – There is an increasing drive towards locating Children’s Centres on school sites. Around 30 have happened already and funding is being channelled by the government towards greater coverage. Children’s Centres will accommodate a variety of uses and users, including nursery provision, family learning and support. As such, they are aimed towards people in the immediate community but may cause a transport impact both on site and locally. (Reference “Ten Year Strategy for Childcare – Guidance for Local Authorities” 2005) Phase II now being implemented with Phase III to come.
- Community Use – In addition to nurseries, the Authority is committed to encouraging schools to increase the amount of use that communities make of school facilities. From a planning point of view this may mean remaining open for longer and potentially creating facilities for different types of use, but only where compatible with the main use.
- Vocational Centres – A number of vocational centres across the county are being created. While these are likely to be located on particular school sites, they are intended generally as shared resources for a number of local schools. They will, therefore, engender a certain amount of travel between school campuses.
- Business Starter Units – *A few of these are being considered, with the potential to link to the school vocational curriculum. The first will be at Astor School, Dover. The planning designation for such units is under discussion.*

Gravesham Borough Profile

Schools Within Gravesham

Primary

Name	Area	Type	PAN Capacity*
Cecil Road PS	Gravesend	Primary	378
Lawn PS	Gravesend	Primary	140
Shears Green IS	Gravesend	Infant	360
Shears Green JS	Gravesend	Junior	480
Riverview IS	Gravesend	Infant	360
Riverview JS	Gravesend	Junior	480
Singlewell PS	Gravesend	Primary	210
Painters Ash PS	Gravesend	Primary	420
Chantry PS	Gravesend	Primary	210
Westcourt School	Gravesend	Primary	210
Wrotham Road PS	Gravesend	Primary	420
Dover Road CPS	Gravesend	Primary	630
Kings Farm PS	Gravesend	Primary	315
Rosherville CEPS	Gravesend	Primary	126
St John's Catholic PS	Gravesend	Primary	630
Whitehill Primary	Gravesend	Primary	420
Raynehurst Primary	Gravesend	Primary	315
Holy Trinity CEPS	Gravesend	Primary	392
St Botolphs CEPS	Gravesend	Primary	210
St Joseph's Catholic PS	Gravesend	Primary	210
Higham PS	Higham	Primary	210
Shorne CEPS	Shorne	Primary	210
Cobham PS	Cobham	Primary	210
Istead Rise PS	Istead Rise	Primary	315
Culverstone Green PS	Culverstone Green	Primary	210
Vigo Village School	Vigo	Primary	210
Meopham CPS	Meopham	Primary	406

Secondary

Name	Area	Type	PAN Capacity*
Gravesend Grammar School	Gravesend	Grammar Boys	979
Gravesend Grammar School for Girls	Gravesend	Grammar Girls	1049
Northfleet Schools for Girls	Northfleet	High Girls	1180
Northfleet Technology College	Northfleet	High Boys	967
Meopham School	Meopham	High	884

St George's CE School	Gravesend	Wide Ability	1264
St John's RC Comprehensive	Gravesend	Wide Ability	1170
Thamesview	Gravesend	High	903

*PAN Capacity is the maximum number of pupils proposed for admission x the number of year groups.

Trends in Pupil Numbers

Primary school rolls stood at 8,039 in 1991 and rose to a high of 9,060 in 1999. Since then they have fallen and are predicted to continue to fall to a low of 7,870 in 2010 at which point they are expected to level out and show some recovery beyond that time.

Secondary schools rolls (without 6th form) stood at 5,770 in 1991 and rose to a high of 6,845 in 2005. Since then they have fallen to 6,730 in 2007 and are predicted to continue to fall into the future, following the primary pattern. A levelling out and some recovery is predicted following that.

6th form – in 1991 approximately 1000 pupils stayed on into the 6th (this represents 15.5% of the total mainstream roll, or 78% of Yr 11 pupils). This proportion has risen to 19% (98.5%) in 2007 and is expected to continue to rise to 20% in 2016, despite the predicted overall fall in mainstream rolls, as pupils are encouraged to continue their education and training to age 18.

Primary Strategy

As a result of primary strategy proposals to reduced surplus accommodation, two schools (Raynehurst Infant and Junior Schools) were amalgamated in September 2006 to create one all-through primary school of 1.5FE (315 pupils).

A number of other schools in Gravesham have reduced their Planned Admission Numbers and either removed, or taken out of teaching use, the surplus accommodation on their sites.

Secondary Strategy

A number of proposals are being made to address surplus places issues in Gravesham:

- Northfleet School for Girls – reduction in Planned Admission Number (PAN) along with partial rebuild from 2008
- Northfleet School for Boys – reduction in PAN and total rebuild by 2010
- St George's CE School – reduction in PAN and total rebuild on existing site by 2010.
- St John's RC School – reduction in PAN and total rebuild by 2010.
- Thamesview – reduction of PAN already agreed, rebuild on existing site by 2010.
- Gravesend Grammar Girls and Boys Schools – reduction in PAN and some rebuilding.
- Meopham School & Wrotham School – linked plans will be needed as they share parts of their catchment areas. Meopham suggested for partial rebuild.

Rural area rolls show greater fall in future years than the urban area.

Children's Centres

- Round 1 - one Children's Centre was created at Riverside, Northfleet.
- Round 2 - four further centres are being worked on for completion in March 2008 at Shears Green PS, Kings Farm PS, Chantry PS and Lawn PS.
- Round 3 - may produce more children's centres, but these are likely to be located within existing buildings or involve the "signposting" and co-ordination of existing services.

Summary

- Issues around falling rolls and the need to reduce surplus places will continue to need to be addressed during the Local Development Framework period. While the KCC has a policy not to close rural primary schools, other issues such as sustainability and performance will need to be taken into account when proposals are made.
- In Gravesham, the BSF secondary school rebuilding programme is under way and will impact on the shape and size of secondary schools.
- The Primary Capital Programme will also have an impact on the shape and size of many primary schools in the future – but over a longer period of time.
- For both secondary and primary schools consideration may need to be given to "enabling developments" to ensure the highest possible capital receipt to enable rebuilding and refurbishment programmes can go ahead.
- The use of schools beyond their normal hours and for a wider range of services will become more common and could have a planning implication.

Appendix C: Comments relating to the minerals

In accordance with MPS1 (at Para 13), RPBs, MPAs and LPAs are required to

safeguard existing, planned and potential rail heads, wharves and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, particularly coal and aggregates, including recycled, secondary and marine-dredged materials

District councils in these areas should not normally permit other development proposals near such safeguarded sites where they might constrain future use for these purposes.

Policy M5 of RPG9 and the Draft South East Plan also states:

strategic facilities should be safeguarded from other inappropriate development in local development documents.

Northfleet Embankment East: contains Red Lion Wharf, which is identified as an active wharf for the import of construction aggregates in the submitted Construction Aggregates DPD. Under the policies of the submitted DPD (CMS6, CA10) the site would be safeguarded.

Unless specific replacement capacity is provided, the loss of an existing mineral wharf or rail depot will be acceptable only if it can be demonstrated that operations relating to the receipt, transport and processing of mineral or mineral related materials are no longer able to be carried out satisfactorily on the site (CA10).

However, Appendix 3 (Planning Principles relating to identified sites) of the Construction Aggregates DPD states that 'the loss of aggregate importing capacity at Red Lion Wharf will be acceptable when a suitable replacement import facility has been provided to the satisfaction of Stema Aggregates' (ignore the part 'to the satisfaction of Stema Aggregates' – this is recognised as being inappropriate).

The 'Kent Aggregates Import Study', which forms part of the evidence base, identified Red Lion Wharf as a 'large' facility. As such, it can be said to play an important role in satisfying the need for construction aggregates in Kent and in supporting the growth agenda in Kent Thameside. Given this, it is essential that land for a suitable replacement facility is identified before redevelopment takes place.

SEEDA recognise this need, and in their representation at Preferred Options stage stated:

Stemma's operations are currently constrained and they are therefore willing to be relocated elsewhere within the area, subject to the identification of a suitable site. In response to the need to re-locate Red Lion Wharf, SEEDA has commissioned a separate piece of work exploring the potentials for intensifying the use of facilities at Swanscombe Peninsula East (Construction Aggregates DPD Site W6 – Northfleet Wharf, Botany Marshes) (Statement of Compliance: Appendix 6, pp 159-160).

The Minerals Planning Authority have not seen, or been consulted on, the proposed SEEDA study. It is felt that this study must be carried out and a satisfactory site for a replacement

wharf must be found before redevelopment of Northfleet Embankment East takes place. This should be recognised in the Gravesham LDF Core Strategy.

Northfleet Embankment West: contains Lafarge's Northfleet Cement Works and the proposed aggregates terminal at 42 Wharf (W24 in the Construction Aggregates DPD). Under the submitted Construction Aggregates DPD, the site is 'protected against development which may constrain (its) potential to (meet) future requirements for construction aggregates' (Policy CA11).

At the Site Allocation Representation consultation stage, Lafarge proposed the inclusion of a site of larger footprint than that shown in the Construction Aggregates DPD. This reflected the site footprint they have proposed for inclusion in the Masterplan. The Minerals Planning Authority would support the safeguarding of this larger site.

The redevelopment of this area should be undertaken in accordance with the emerging Masterplan, which should recognise the potential of the site for an aggregate import facility. The Masterplan should seek a harmonious pattern of land use, which will not constrain the operation of the proposed aggregate import facility.

The Industrial Core:

As an existing marine wharf the 'new cement facility' is a Minerals Consultation Area. Therefore, under Core Minerals Strategy Policy CMS6:

Unless specific replacement capacity is provided for the resources or infrastructure, proposals which would sterilise, or be a serious hindrance to, the future availability of the mineral resources and mineral related infrastructure within mineral consultation areas will be refused.

Para 13 of MPS1 and Policy M5 of RPG9 and the Draft South East Plan are also relevant here.

Swanscombe Peninsula: Robins Wharf (W11 and W12) and Northfleet Wharf, Botany Marshes (W6) fall within this area.

Under submitted MDF policies CA10 and CMS6, Policy M5 of RPG9 and the Draft South East Plan, and Para 13 of MPS1 these sites are safeguarded. Future development near these sites should not constrain their future use for minerals importation.

Also: Denton Wharf is identified as an existing wharf in the submitted Construction Aggregates DPD. This site is also safeguarded under submitted MDF policies CA10 and CMS6, Policy M5 of RPG9 and the Draft South East Plan, and Para 13 of MPS1.

Appendix D: Comments from KCC Biodiversity team

The structure of the Issues and Options document does not provide for a topic based focus on biodiversity although it is appreciated that these considerations find reflection in parts of the document e.g. in relation to green infrastructure and the countryside. However it will be important that the LDF, whether through its Core Strategy or development control policies gives recognition to a number of considerations allied to biodiversity protection and enhancement

There is a need for a core policy on biodiversity consideration and enhancement for the area. Enhancement of biodiversity in the area through specific developments, connectivity of habitats and green space, the green grid, multi functionality of open spaces, permeable landscape, and gardens should be maximised. Connections to the Kent Thameside Green Grid are very important and the green spaces providing these connections can be multifunctional and therefore include features beneficial to both people and wildlife.

Brownfield sites can support important biodiversity and protected species and any impacts should be fully assessed. It is important that a scoping survey is carried out on the development sites prior to determination to identify any potential impacts on protected and BAP species. The sites may be able to support protected species such as, but not limited to, amphibians, reptiles, birds and bats. The species and their habitats may be affected by works that will be carried out on site. The surveys should be carried out by an experienced and licensed (if necessary) ecologist.

Biodiversity enhancement measures should be incorporated in development sites. There should be no net loss of biodiversity. The key principles of PPS9 are not only to avoid, mitigate or compensate for harm to biodiversity but also to incorporate ways to enhance and restore it. A number of methods can be used to increase biodiversity: for example, the inclusion of bat bricks in new buildings, bird and bat boxes in the surrounding areas, native and local provenance planting, pond creation and refugia for herpetofauna .

Developments should increase available space for nature and improve connectivity between green space for example through the management of verges on bike and pathways. The use of lighting, (type, positioning and timings) should be designed to have minimal impact on nocturnal biodiversity. Landscaping should aim to maximise habitats for nature. For example, grass areas should be sown with a native local provenance grass and wildflower mix. Some areas should be left as rough grassland with appropriate mowing regimes.

Sustainable Urban Drainage Systems should be used when designing site drainage. It will reduce the risk of localised flooding on the development sites and surrounding developments and it can help to protect and enhance ground water quality and biodiversity.

Where possible green roofs should be created. Green roofs and walls increase the available space for nature and can increase biodiversity in the area. These should be designed with biodiversity enhancement in mind and for an appropriate habitat for the area.

Interpretation can be incorporated in to the landscaping to enable users of the site to realise the importance of the habitats for wildlife in their town and the proactive habitat management is not just a lack of maintenance.

Housing

The developments should aim to contribute to the Kent Biodiversity Action Plan (KBAP) which includes a Habitat Action Plan (HAP) for Built Up Areas and Gardens. This HAP is vitally important due to the opportunities that green space in urban areas can provide for people to have close contact with wildlife. Domestic gardens and urban greenspaces provide habitats for UK and Kent BAP species along with other more widespread species. There are also certain species, such as some bats and birds, which have a particular affinity with built structures. The Kent BAP Built Up Areas and Gardens HAP *"seeks to promote the need to carefully design and landscape both existing and new developments in Kent so that biodiversity is recognised and opportunities for wildlife are maximised; both for biodiversity in its own right and for the benefits biodiversity brings to local communities"*.

New housing should aim to increase the available habitats for nature. The inclusion of bat bricks and tiles, bird and bat boxes and green roofs can help increase and promote biodiversity alongside development.

Increasing the available space for nature will increase connectivity throughout the area. Connectivity between habitats is vital to stop fragmentation between habitats and to help biodiversity to adapt to climate change.

Climate Change

The climate change section of the core strategy document concentrates on mitigation for climate change (reducing our carbon footprint) and does not incorporate the adaptation measures which will be required. The natural environment will require adaptation measures to allow our wildlife and habitats to adapt to future climate change. An ecological network which allows biodiversity to adapt to climate change and which incorporates a variety of measures (e.g. habitat creation, habitat enhancement, buffering habitat areas and protected sites, creating connections through corridors and stepping stones and increasing the permeability of our wider landscape for biodiversity) should be pursued. The South East Plan requires that areas for habitat creation and enhancement be identified and this should be done in a strategic and effective way. The design of an ecological network can help target this action in the most beneficial places for people and wildlife. The reconnection and protection of ecological networks are required by PPS9. A policy covering the provision of this network should be considered for the core Strategy.

There are a number of projects, initiatives and documents that can give information and advice on this matter. The BRANCH Project (www.branchproject.org) looked at how spatial planning can help biodiversity adapt to climate change and has produced some very useful results and tools. The Wildlife Trust's 'A Living Landscape' document sets out a vision for an ecological network based on existing habitat and the opportunities for habitat creation in the region. We in the Natural Environment and Coasts team are very happy to provide further help and advice on the production of a policy and strategy for the development of an ecological network in Gravesham.

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