



Gravesham LDF,  
Planning and Regeneration Services,  
Civic Centre,  
Gravesend,  
Kent DA12 1AU

Our Reference: 07-070

Date: 20<sup>th</sup> November 2007

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Dear Sirs

**Re: Core Strategy Issues And Options : Response**

We act for a group comprising Barratts Eastern Counties, Fort Knight Group, The Rochester Bridgewardens Trust and Kent County Council who have interests in land at North East Gravesend.

As you know development at North East Gravesend has been progressed over a number of years and there continues to be the opportunity to take these proposals further, to the advantage of the wider area. In this context we attach our clients comments on the Issues and Options document recently published.

We trust that these will be taken fully into account in formulating future development options for Gravesham as a whole, and North East Gravesend and the Canal Basin in particular. Please do not hesitate to contact the writer, however, if you would like any clarification on submission made, or feel that it would be useful to discuss any of the matters raised in more detail.

Yours sincerely,

**Robert L Meek BSc (Econ), MRTPI**  
Kember Loudon Williams Ltd

**Local Development Framework Regulation 25  
Consultation on:  
Core Strategy Key Issues and Options**



We will accept photocopies of this form or you can download it from the Councils web site at: [www.gravesham.gov.uk](http://www.gravesham.gov.uk). The consultation document can also be viewed on the web site, at local libraries, Towncentric and Civic Centre.

You must complete part A of the form, where relevant. Representations will not be accepted without a name and address. In part B you only need respond to the questions on which you wish to make comment. Completion of Parts C and D are optional. All data you supply will be used in connection with the preparation of the Local Development Framework and no other purpose. Your name/organisation and any comments you make may be made public. Please sign and date the form on page 13.

**Part A: Your details**

<b>Name:</b>	Barratts Eastern Counties, Fort Knight Group, The Rochester Bridgewardens Trust and Kent County Council
<b>Address:</b>	c/o Kember Loudon Williams Ltd
<b>Post Cod</b>	
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**Agent Details (if applicable)**

<b>Firm name:</b>	Kember Loudon Williams Ltd
<b>Your name:</b>	Bob Meek
<b>Address:</b>	
<b>Post Code:</b>	
<b>Job Title:</b>	Director
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**Part B: Consultation Questions**

The text for each topic (or sub topic) in the Core Strategy Key Issues and Options Paper sets out the key options and the Borough Councils preferred options. The questionnaire below sets out each of the key options in highly abbreviated form. Your responses should be considered on the basis of the full text NOT the abbreviated version given here. You only need respond to those questions where you wish to express a preference, simply by ticking the box on the option you prefer. Most questions require the selection of one response; a few clearly indicated allow more than one option to be selected. There is space for written comments at the end of the form.

**A. Key Spatial Objectives (pages 14 – 17 of report)**

Do you agree or disagree with the Key Spatial Objectives set out in the report?

	Agree *	Disagree	
SO 1 – Delivering the Major Development Sites	<input checked="" type="checkbox"/>	<input type="checkbox"/>	* Note : subject to detailed comments submitted on specific topic issues
SO 2 – Employment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 3 – Housing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 4 – Retail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 5 – Culture, Leisure and Tourism	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 6 – Community Infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 7 – Built Environment	<input type="checkbox"/>	<input type="checkbox"/>	
SO 8 – Heritage and the Historic Environment	<input type="checkbox"/>	<input type="checkbox"/>	
SO 9 – Green Infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 10 – Transport and Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 11 – Climate Change and Renewable Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 12 – Location of New Development and Management of Flood Risk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 13 – Water Supply and Water Quality	<input type="checkbox"/>	<input type="checkbox"/>	
SO 14 – Thames Riverside	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 15 – The Countryside	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
SO 16 – Rural Settlements	<input type="checkbox"/>	<input type="checkbox"/>	

If you disagree with any of the Key Spatial Objectives or think there should be others, please set out your comments separately at the end of the questionnaire.

**#1. Delivering the Major Development Sites (pages 19 – 30 of report)**

1. Where should growth be located?
    - a. Sequential approach with an emphasis on previously developed land, having regard to flood risk and public transport availability
    - b. Prioritise sites at least risk from flooding, irrespective of whether previously developed etc.
    - c. New settlement pattern by means of Green Belt boundary review
- } in combination

2. What sort of Development should be encouraged?
- Urban forms based on public transport orientated, mixed use communities
  - Place emphasis on car usage
3. Is it necessary to achieve a balance between housing and employment on the major sites?
- Balance between housing and employment uses as in South East Plan
  - Housing growth given priority over employment
  - Employment growth given priority over housing
- #2. Employment (pages 31 – 35 of report)**
- What sort of employment structure should the Borough seek?
    - Appropriate balance across types of jobs
    - Concentrate on office (B1a) employment
    - Concentrate on industrial/commercial (B1c/B2/B8) employment
    - Prioritise riverside sites for port uses
- #3. Housing (Pages 37 – 43 of report)**
- What sort of housing should be developed in Gravesham?
    - Variety of dwelling types to meet needs and within site constraints
    - Increased proportion of flats/apartments
    - Maintain the current proportion of flats in total housing stock
  - What should be the percentage of affordable housing in the Borough?
    - Retain existing target of 30%
    - Increase target from 30% to 40%
  - Should the thresholds which apply to the target for affordable housing be lowered in the urban and rural areas?
    - Lowered to 0.5 ha/15 units urban; 50% on 2 or more units rural
    - Or introduce new single threshold
    - Or retain existing thresholds
- #3a. Gypsies and Travellers (pages 44 - 59 of report)**

Do you agree/disagree with the Objective set out on page 46 of the report?

Agree  Disagree

If you disagree, please set out your reasons or proposed alterations separately at the end of the questionnaire.

1. How many permanent pitches, on the evidence set out in the Gypsy and Traveller Accommodation Assessment, should the Council provide?
    - a. 15 permanent pitches
    - b. As above but with additional for those in permanent housing
  2. Given the number of unauthorised encampments that occur annually in the Borough and that work is ongoing at a County and SEERA level to determine the level of transit pitch provision required in the Borough, should the Council?
    - a. Allocate land following the completion of the KCC/SEERA work
    - b. Safeguard land on the basis that some provision will be needed
  3. Should the factors for assessing the suitability of the site reflect those set out in Circular 01/2006?
    - a. Yes
    - b. No

If you think additional factors should be taken into consideration please make comments at the end of the questionnaire.

*[For information: Circular 01/2006 can be viewed on line at <http://www.communities.gov.uk/publications/planningandbuilding/circularcommunities2> or in hard copy at the Planning Department]*
  4. Where should Gypsy and Traveller sites be located?
    - a. Sites within the urban area and rural settlements only
    - b. As above plus Green Belt sites on the edge of built up areas
    - c. Accessible Green Belt sites in urban fringe or next to villages
    - d. In the rural area away from existing settlements
  5. What type of site(s) should the Borough Council provide to meet the accommodation needs of Gypsies and Travellers?
    - a. A number of small family sites
    - b. A single site for many families
- #4. Retail (pages 61 – 66 of report)**
1. Where should the demand for increased retail floorspace be met?
    - a. Gravesend Town Centre, edge of centre, local centres hierarchy
    - b. As above but major retail role for Ebbsfleet
    - c. Allow unrestricted location
  2. Given its specific location requirements, where in broad terms should retail warehousing be located?
    - a. The Imperial Business and Retail Park
    - b. A new retail park on a major site
    - c. Ad hoc permissions on sites in the urban area

**#5. Culture, Leisure and Tourism** (pages 67 – 84 of report)

1. The paper sets out a 'baseline' case focussed around the town centre and a limited role for Ebbsfleet and other transport nodes, with indoor sports and leisure focused on the Cygnet and Cascades Leisure Centres, support for certain other specialist locations or facilities such as Meopham School and the Ebbsfleet United FC stadium, and with an increased role for tourism.

Which option do you support? You may chose 'a' as the 'baseline' case set out in the report or a variation of this by ticking any of the boxes from 'b' to 'i'.

- |                                                                 |                                     |
|-----------------------------------------------------------------|-------------------------------------|
| a. The baseline strategy as set out in the issues paper         | <input checked="" type="checkbox"/> |
| b. As 'a' but with location more dependent on the car           | <input type="checkbox"/>            |
| c. As 'a' but with hotels allowed away from town centre         | <input type="checkbox"/>            |
| d. As 'a' but with Ebbsfleet taking a more major role           | <input type="checkbox"/>            |
| e. As 'a' with main indoor sport provision focussed on one site | <input type="checkbox"/>            |
| f. As 'a' but with no rural sports hub at Meopham               | <input type="checkbox"/>            |
| g. As 'a' but no support to specialist sports provision         | <input type="checkbox"/>            |
| h. As 'a' but no support for Ebbsfleet United                   | <input type="checkbox"/>            |
| i. As 'a' but no support for tourism development                | <input type="checkbox"/>            |

If you support none of the above options, please set out your reasons and your proposed alternative in the space provided at the end of the questionnaire.

**#6. Community Infrastructure** (pages 86 – 97 of report)

1. Should the provision of new community infrastructure be supported?
- |                                            |                                     |
|--------------------------------------------|-------------------------------------|
| a. Wide range of community facilities      | <input checked="" type="checkbox"/> |
| b. Only key services                       | <input type="checkbox"/>            |
| c. Only within major new development sites | <input type="checkbox"/>            |
| d. No new provision                        | <input type="checkbox"/>            |
2. Should existing community infrastructure be protected and retained?
- |                                                              |                                     |
|--------------------------------------------------------------|-------------------------------------|
| a. Loss of existing facilities will be normally resisted     | <input type="checkbox"/>            |
| b. Retention will be determined by operational/market forces | <input checked="" type="checkbox"/> |
3. Should new community infrastructure be provided in line with major new developments?
- |                                                        |                          |
|--------------------------------------------------------|--------------------------|
| a. Major new development only with adequate facilities | <input type="checkbox"/> |
| b. Major new development not dependent on facilities   | <input type="checkbox"/> |
4. Should proposals for major new development be required to conduct a Health Impact Assessment (HIA)?
- |                                 |                          |
|---------------------------------|--------------------------|
| a. HIA required for major sites | <input type="checkbox"/> |
| b. No HIA required              | <input type="checkbox"/> |

5. Where should new community facilities (e.g. schools, hospitals and post office) be located?
- a. Community facilities at nodal transport points/local centres
  - b. Community facilities in residential areas
6. Should community facilities be encouraged as part of mixed-use development?
- a. Community facilities should be part of mixed use development
  - b. New facilities not to be encouraged as part of development
7. Should school sites be expanded to create additional community uses?
- a. School facilities should be available to the whole community
  - b. School facilities should remain focussed on education
8. Should new utility services be co-located with existing services?
- a. Co-location of utility services where possible
  - b. No co-location
9. Should new telecommunications development and infrastructure be supported?
- a. Encouragement for full cable etc provision for whole Borough
  - b. Provision concentrated in major new development
  - c. No support
10. Should erection of new pylons and overhead lines be resisted and existing redundant lines removed?
- a. Resist new overhead lines and underground if feasible
  - b. New pylons/overhead lines to follow line of existing
  - c. New lines supported
- #7. Built Environment (pages 98 – 107 of report)**
1. What should the Council do to improve the overall quality of the public realm and to promote a better use of public open space? (tick all that apply)
- a. Propose a major new town square
  - b. Create a number of smaller open spaces
  - c. Improve existing open spaces
  - d. Promote 'shared-pavements' streets rather than 'roads'
2. What kind of development and building heights would you consider to be most appropriate to fit into the image and local character of Gravesham?
- a. High rise – low coverage
  - b. Low rise – high coverage
  - c. Medium rise – medium coverage

3. Where would be the most appropriate locations for taller development and, in exceptional circumstances, a landmark building?
- a. At the "nodes"
  - b. Along transport "corridors"
  - c. Within the design scheme of large urban regeneration sites
  - d. At the waterfront along the Thames at Gravesend and Northfleet
4. What land uses would you consider the most appropriate for tall and landmark buildings?
- a. Mix of office/commercial etc but non-residential
  - b. Mix of office/commercial etc including residential use
  - c. Mainly residential but ground floor office/commercial
- #8. Heritage and Historic Environment (pages 108 – 113 of report)**
1. What should the approach be to the Borough's heritage and historic environment?
- a. Proactive use of heritage as central to regeneration
  - b. Adopt a minimalist approach compatible with legislation
  - c. Give greater priority to other objectives over heritage
- #9. Green Infrastructure (Pages 114 – 123 of report)**
1. What approach should the Borough Council adopt toward the provision of Green Infrastructure – i.e. open space and other such natural assets?
- a. Reduce commitment to green infrastructure/open space etc
  - b. Continue existing policy
  - c. Champion improvements to green infrastructure/open space etc. to support regeneration of area
- #10. Transport and Air Quality (pages 124 – 131 of report)**
1. From the transport perspective what should the physical form of development be?
- a. Promote public transport orientated development
  - b. Plan for private car growth
2. What should the housing / employment balance be given the transport implications from commuting?
- a. Reduce out commuting and promote Ebbsfleet
  - b. Priority on housing growth
  - c. Priority on employment growth
3. How should the transport funding gap be addressed?
- a. Introduction of a transport levy
  - b. Site by site negotiations on transport contributions



4. How can the management of air quality be taken forward?
- a. Seek to minimise impact of increasing traffic levels
- b. Apply tariff approach to generate additional funds

**#10a. Town Centre Transport and Major Sites** (pages 132 – 140 of report)

Do you agree/disagree with the Objective set out on page 134 of the report?

Agree  Disagree

If you disagree, please set out your reasons or proposed alterations separately at the end of the questionnaire.

1. Key criteria for the future town centre transport network?
- a. Maximise public transport access etc
- b. Give priority to free flow on existing network
2. Transport Quarter objectives should be to?
- a. Maximise public transport access and interchange
- b. Allow piecemeal development and existing car parking
3. Approach to town centre car parking should be to?
- a. Managing existing and new stock efficiently for long/short stay parking with new residential development expected to provide on average 1 parking space per dwelling.
- b. Attempt to meet car parking demand by additional provision
- c. Reduce car park provision, particularly long stay
4. Proposals for the Heritage Quarter should be?
- a. Comprehensive quality mixed use development of both sites
- b. Piecemeal development of the sites
- c. Concentrate initially on either eastern or western site
5. On Imperial Site, proposals should seek to?
- a. Explore options for mixed use development
- b. Allow piecemeal development in response to market demand

**#11. Climate Change, Sustainable Development and Renewable Energy** (Pages 142 – 149 of report)

1. What approach should the Borough Council adopt toward the questions of climate change, sustainability and use/production of renewable energy?
- a. Do nothing/minimum required under legislation
- b. Adopt a proactive approach with the Borough Council taking a lead on climate change, sustainability and use/production of renewable energy.

**#12. Flood Risk (pages 150 – 156 of report)**

1. In terms of location of new development
  - a. Making best use of previously developed land so as to avoid fresh land take but taking into account ability to defend against flooding whilst managing residual risk
  - b. Prioritise sites least likely to flood
  - c. Emphasis on new settlement pattern

**#13. Water Supply and Quality (Pages 158 – 165 of report)**

1. What approach should the Borough Council adopt to questions of water supply and water quality?
  - a. Do nothing/minimum required under legislation
  - b. Adopt a proactive approach with the Borough Council taking a lead on water supply and quality issues

**#14. Thames Riverside (Pages 166 – 185 of report)**

This topic paper looks at the Thames Riverside on a site-by-site basis, noting that on a number of sections there is likely to be little change over the LDF period whilst others may be subject to significant change. It will be noted that there is overlap between this topic paper and other dealing with the Major Sites. The questions set out below pick up on some of the options thought to be available and a range of more detailed points.

Please select the options you agree with and make any further points in relation to any particular area in the space provided at the end of the questionnaire.

**Please note that some questions allow for more than one choice to be made.**

1. **North Kent Marshes east of Metropolitan Police Training Centre:**
  - a. Improve access and nature conservation interest
  - b. Reinststate Thames & Medway Canal (including reinstatement of the urban section from Canal Basin to Mark Lane)
  - c. No change
2. **Denton Slipways to the Metropolitan Police Training Centre (1)**
  - a. Retain river related/commercial uses along frontage from Canal Basin along riverfront to Denton Wharf
  - b. Promote mixed use development along riverfront from Canal Basin to Denton Wharf then retain existing river related uses
3. **Denton Slipways to the Metropolitan Police Training Centre (2)**
  - a. Build a new bridge over the canal and railway to assist in regeneration and take heavy traffic out of Town Centre/ Canal Basin area

- b. Limit development to traffic capacity of Ordnance Road junction
4. **Canal Basin Regeneration Area**  
Outline planning permission for mixed use development in place. Unlikely that alternative strategic options will be available over LDF period. Potential for reinstatement of Thames and Medway Canal covered in 14(1) above.
5. **Riverside Leisure Area**  
No strategic options as area is significant Town Centre related recreational site likely to be retained in such use through LDF period.
6. **Custom House/Royal Terrace Pier/PLA Offices**  
No strategic options (see Town Centre)
7. **Royal Clarendon Hotel/Clarendon Lawn to Town Pier**  
No strategic options (see Town Centre)
8. **Town Pier to West Street Pier**  
No strategic options (see Town Centre)
9. **Baltic Wharf to Imperial Wharf**  
No strategic options (see Town Centre)
10. **Landsdowne Square**  
No strategic options (part of Conservation Area)
11. **Northfleet Embankment East**  
a. Promote mixed use redevelopment of eastern/central part of site, retaining employment uses to west at Kimberley Clark etc   
b. Retain all of area in industrial use
12. **Northfleet Embankment Centre Industrial Area**  
No strategic options as area likely to be retained for cement importation and other river related/industrial uses over LDF period.
13. **Northfleet Embankment West**  
a. Reinststate and enhance links along Ebbsfleet   
b. Relocate river businesses to Swanscombe Peninsula   
c. No change
14. **Swanscombe Peninsula**  
a. Accept relocated river related businesses   
b. Enhance local access links   
c. No change

**#15. Countryside** (pages 186 – 193 of report)

1. How do we protect and enhance the countryside whilst ensuring that it remains vibrant and that people living in the rural areas have appropriate access to services?
  - a. Support rural diversification with small scale Green Belt release
  - b. Support rural diversification with larger scale Green Belt release
  - c. Give priority to Green Belt and other conservation policies
  
2. The current policy on extensions to residential properties in the Green Belt allows an increase of one third over original floor area. Should this allowance change?
  - a. Be maintained at existing level
  - b. Be increased
  - c. Be reduced
  
3. What should the role of the urban/rural fringe in Gravesham?
  - a. Adopt a positive management strategy
  - b. Continue the current restrictive approach

**#15a. Culverstone Valley Area** (Pages 194 – 204 of report)

Do you agree/disagree with the Objective set out on page 197 of the report?

Agree  Disagree

If you disagree, please set out your reasons or proposed alterations separately at the end of the questionnaire.

1. How should development within the Culverstone Valley Area be controlled?
  - a. Separate policy until all authorised plots are developed
  - b. Normal Green Belt policy with allowance for adequate amenities
  
2. If a separate policy approach is maintained should authorised caravans continue to be allowed to be replaced with a permanent dwelling?
  - a. Caravans should be treated as elsewhere in the Borough
  - b. The exceptions policy for caravans should be retained
  
3. If a separate policy approach is maintained, should the existing floorspace limit for replacing or extending authorised chalets be retained?
  - a. Maintain the existing floorspace limit of 92.7m<sup>2</sup>
  - b. Allow one third expansion as normal in the Green Belt
  - c. Increase the floorspace

If you consider the floorspace limit should be increased please set out your reasons in the comments section at the end of the questionnaire.

4. A number of issues have been raised in previous consultations relating to vacant plots, woodland areas and highway access in the Culverstone Valley Area. If you wish to make any comment on the Borough Council's position on these issues please make them in the comments section at the end of this questionnaire.

**#16. Rural Settlements (pages 205 – 208 of report)**

What should be the approach of the Council to the planning of rural settlements over the next 20 years?

- a) By continuing with existing policies, i.e. permitting infill within the existing village envelopes but no incursions into the Green Belt, except for affordable housing on small sites, where a need has been justified in a Parish Survey.
- b) By reviewing village envelopes with the aim of identifying small parcels of land that may be taken into the envelope for specific forms of development.
- c) By limited extensions to village boundaries, in locations well related to public transport, where there is an identified requirement for special needs/affordable housing or community facilities and there are no suitable sites in the village.

**ਕੀ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾ ਜਾਂ ਫਾਰਮੈਟ ਵਿੱਚ ਚਾਹੀਦੀ ਹੈ ?**

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ਮਿਨੀਕਮ 01474 33 76 17 ਜਾਂ ਈ-ਮੇਲ [customer.services@gravesham.gov.uk](mailto:customer.services@gravesham.gov.uk)**

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Dev032 Dev079 Dev083 STA033

**Gravesham Borough Council  
Local Development Framework Core Strategy**

**Key Issues and Options – October 2007**

These submissions are made on behalf of Barratt Eastern Counties, Fort Knight Group plc, the Rochester Bridgewardens Trust and Kent County Council, who have been working with Gravesham Borough Council over the past 15 years to promote and deliver the regeneration of the North East Gravesend area. In that time they have undertaken substantial investment in the infrastructure of the area that has secured:

- the acquisition/relocation of the Kwik-Fit depot to facilitate the provision of key highway infrastructure and allow the establishment of the North Kent College of Further Education on the former Gordon School site;
- the construction of Dering Way and Dering Way extension, and the Denton Relief Road, allowing access to Comma Oil and offering the potential for access to future local development opportunities while relieving access pressures elsewhere within the locality;
- major improvements to the Lion Roundabout to improve its capacity and operational efficiency;
- a contribution of £600,000 to Project Denton that helped the Borough Council secure Single Regeneration Budget funding towards the Denton Relief Road and associated regeneration works in the area;
- the construction of Dalefield Way, providing access to adjacent land for future development as part of the on-going regeneration programme;
- the provision of a significant number of new dwellings, including affordable housing, which, together with the creation additional local employment opportunities, have made a substantial contribution to the regeneration of the area, all made possible by the improvements to the local infrastructure outlined above.

In association with the above there have also been substantial improvements undertaken with the agreement of the Borough Council, the Environment Agency and Natural England, relating to the form of surface water drainage systems and related water-course improvements. As part of the agreed strategy substantial buffer zones were also established to protect the water quality and ecology of these watercourses and the nearby SSSI. These areas were also designated as Public Open Space, with the initial stages of new Public Rights of Way also provided as the first stage in improving access to the surrounding countryside, with completion of that process agreed as an integral part of future planned phases of development in the area as part of the continuing regeneration programme for North East Gravesend.

All of these provisions have been underwritten through a number of Section 106 Agreements, which were entered into in recognition of the proposed continuation to completion of the

remainder of the North East Gravesend area, as designated under Policy PM9 of the adopted Local Plan. They have also been undertaken in accordance with the comments of the Local Plan Inspector who, in approving that allocation, set out a number of criteria that were to be taken into account in implementing the development of that area.

This was to be guided by a Development Brief, which in its original form was adopted by the Borough Council in 1996 as Supplementary Planning Guidance. Subsequently the Borough Council, working in conjunction with the South East England Development Agency (SEEDA), instructed Urban Practitioners to prepare a comprehensive Master Plan for the North East Gravesend and Canal Basin area as the basis for longer term planning in the area. We were informed that that work would be fed into the Local Development Document process to inform the development of future planning policy. It is not clear whether that has, in practice, occurred.

That document, however, maintained the overall strategy for the completion of the North East Gravesend area by the development of the remainder of the PM9 allocation for a mixed development, including housing, community facilities and employment uses. It also, however, recognised the potential of development in this area providing the opportunity to secure access across the railway and the adjacent canal to the Canal Basin area, as an essential component in realising the development potential of this area – which is seen as a key component in the Borough Council's overall strategy for the regeneration of the Borough – to be realised, while also offering the relief necessary to enable the roads serving the town centre to function satisfactorily.

It is considered that, given the foregoing, there remains a key role to be played by the North East Gravesend area in securing completion of the regeneration of this area, and in enabling the Borough Council to achieve its wider strategy and associated objectives. It is against this background that we make the following comments on the Issues and Options document.

While not taking issue with the objectives identified as underpinning the emerging spatial strategy, our clients offer the following comments on the issues and options as identified and assessed by the Borough Council.

### **SO1 Delivering The Major Development Sites**

While it is encouraging to see that the Canal Basin and North East Gravesend are identified as one of the Major Development Sites to be pursued in fulfilling the strategic needs of the Borough, and that as such this area is - in our view rightly - identified as a 'given' in this context, it is important to recognise that, in the case of North East Gravesend, key investment in the infrastructure that is necessary to realise the potential of this area in the short to medium term has already been made. It would in consequence be inappropriate not now to ensure that the full potential of this investment in key components of local infrastructure is fully utilised.

There is, however, a need to approach the regeneration and redevelopment of the site in a more comprehensive fashion than has occurred thus far. In saying this it is recognised that there may be a measure of conflict with the objective of ensuring that the major developed sites should concentrate development on previously developed land within the urban area. Whilst this is a laudable aim we would suggest that recognition needs to be given to the fact that in making the best use of existing



infrastructure investment, and in order to secure the delivery of the Canal Basin site – which sits at the heart of the Borough's wider strategy for this part of Gravesend - it may be necessary to allow the release of some greenfield sites to achieve the wider objectives. If this is not acknowledged the limitation on access to the Canal Basin, which is currently available only from the west via the A226 Milton Road and Ordnance Road, is likely to prove a major hindrance in the Borough Council's ability to realise its aspirations for this area.

The solution to this conundrum is to extend Dering Way north across the railway and canal to provide an access to the Canal Basin with sufficient capacity to serve the intended uses, as was originally intended. This could connect with an eastwards extension of the recently constructed Dalefield Way to join the Lower Higham Road, bypassing Lion Roundabout to ensure that this does not act as a constraint on the capacity of the new link to serve the Canal Basin and North East Gravesend area. The road could then be extended south to the A226, acting as a bypass around the north eastern edge of the town. The existing section of Dalefield Way was built with this main in mind and was designed as a distributor road.

This would achieve the stated aim of regeneration/redevelopment of the entire Canal Basin and North East Gravesend area, and if structured appropriately could, through associated development, generate a substantial component of the funding required to provide the key additional infrastructure that would be required. It would also help reduce flows to the A226 Milton Road/Rochester Road and relieve pressure on the congested Milton Road/Ordnance Road junction by providing an alternative route to and from the Canal Basin site.

We note that the proposed strategy also places an emphasis on the need to improve the quality of life and access to housing, jobs and services for all, whilst ensuring that existing and new developments are fully integrated. Our clients strongly support this aim. The comprehensive allocation of land at North-East Gravesend can be fully integrated with not only the recently developed parts of North-East Gravesend (including the existing and planned business, retail and residential areas), but also the wider area – particularly through increasing/improving employment, community and recreation provision in the locale. In terms of integration with public transport we note that the North-East Gravesend area lies within 400m of the proposed extension of the Fastrack quality bus route which, as noted in the Issues and Options document, will provide a fast and reliable public transport service which will facilitate access through, and across, the Gravesend urban area as a whole.

Finally, we note that reference is made to the issue of flood risk as a key consideration in the realisation of the Major Growth areas, and it is suggested that the sequential approach to the release of land be adopted. Whilst this appears logical, it must be recognised that a very large part of Gravesham Borough is subject to flood risk, particularly from a breach in the sea defences that lie along the banks of the River Thames. It must also be recognised that the standard of these defences is exceptionally high, in large measure mitigating the risk from flooding in real terms. In light of this the acceptance that, flood risk notwithstanding, development can come forward where the risk of flooding can be adequately managed, is welcomed as clarifying the suitability of land at North-East Gravesend for continued development.

In light of our comments, we consider that in terms of the location of development a combination of options (a) and (b) would be appropriate, while in terms of development mix and the balance to be

sought between housing and employment we would favour option (a) of those offered in both each instances.

## **SO2 Employment**

The options for employment provision and retention in the Borough appear to focus very heavily on achieving the development of Ebbsfleet as a major node for employment (in particular for B1 purposes). This carries with it a risk that the potential for employment development elsewhere in the Borough will be cast in a subservient role, which in our view could result in the loss of locally based employment. It is pleasing, therefore, that there appears to be a recognition by the Borough Council that this would be inappropriate and that there is a need to promote and retain a diversity of employment opportunities elsewhere.

Our clients welcome this approach, and the need to improve the supply of local jobs to diversify the local employment base as an alternative to out-commuting. A mixed-use allocation of North-East Gravesend in the short to medium term, comprising of residential, community, business (B2 and B8 uses) and recreation uses – together with the proposed link to be provided with the Canal Basin site – could aid in fulfilling this objective.

It may, however, be prudent to consider whether other forms of employment provision (B1 Uses) should also be encouraged on a wider basis, as the current focus on Ebbsfleet may prove to be detrimental, as any delays in securing the anticipated floorspace there would impact disproportionately on the remainder of the Borough, placing its ability to generate the scale and range of jobs required at significant risk.

Subject to the comments above we would favour option (a) of those identified in the Issues and Options document.

## **SO3 Housing**

The emerging South East Plan sets the number of dwellings required in Gravesham over the period of 2006 – 2026 at 9,300, and the Council has agreed to work towards this target. This quantum of housing is an appropriate basis from which to plan for the growth of the area, and our client supports this stance.

In saying this, however, there is a need to ensure that the supply of housing land provides the choice of site and mix of development that will genuinely address the housing needs of the Borough over the longer term, and in this context it would be a mistake to be overly prescriptive in seeking to control dwelling size and mix. Equally, land identified must be genuinely available for development if the provision of new housing is to meet strategic requirements. This necessitates the adoption of a flexible approach to the identification of potential housing land, coupled with a rigorous assessment of genuine availability, particularly of previously developed land where site conditions can and will restrict the Borough Council's ability to bring them forward to development.

Our clients strongly support the suggestions in the Issues and Options Document that a 30% proportion of affordable housing is an appropriate level at which to set any requirement. Given the other constraints that many sites within the Borough must contend with if their potential is to be realised, any greater requirement would be likely to impose too great a financial burden on development to be attainable. We therefore concur that a 40% requirement would be unrealistic, would hinder required improvements the level of affordable housing being achieved, and potentially discourage the regeneration strategy being pursued.

In light of our comments, we consider that in terms of the type of housing to be provided option (a) would be appropriate, while in terms of the percentage of affordable housing to be provided we again support option (a). In terms of the threshold levels to be set, it would be inappropriate to reduce these to the point where any benefits that derive maintaining the percentage at 30% is effectively discounted. On this basis we would favour option we would favour option (c).

#### **SO4 Retail**

The need to promote access to a wide range and quality of retail provision, with Gravesend Town Centre at its core, but with sufficient provision at Ebbsfleet to meet the needs of development in that location, is considered to offer the best overall balance for major retail facilities commensurate with the other objectives of policy. In saying this, however, it is essential that existing neighbourhoods and new developments should be provided with local centres to satisfy local needs.

Our clients support this notion, and recognise the need to integrate new residential development within local centres to meet the basic shopping needs of residents. At North-East Gravesend this is reflected in the approach that is being adopted in current planning applications, and this principle has been acknowledged by the Borough Council as a suitable approach to adopt in this area.

In promoting such a hierarchical structure to retail provision, however, it must be recognised that it is necessary to ensure that ready access to higher order centres is available, as local retail facilities will not meet all of the retail needs of the communities that they serve. In this context access to the town centre, in particular by public transport, will be a relevant consideration in the choice of development options.

Subject to the comments above we would favour option (a) of those identified by the Borough Council.

#### **SO5 Culture Leisure And Tourism**

Our clients support the promotion of new community and leisure facilities as a means to contribute towards regeneration, and provide health benefits.

This is reflected in their approach to the development that has already taken place within North-East Gravesend, and can be developed further as part of the continuing regeneration in this area, to secure the additional sports pitches and public open space that will accompany that development, as identified in the key issues outlined in this section of the Issues and Options document.

Though discussed elsewhere, this can also extend to securing the protection and restoration of the ecology of the wider area including safeguards for existing SSSI and the potential to create new local nature reserve areas as part of a comprehensive strategy for the wider area that will provide improved opportunities for associated leisure activities serving the wider community.

Subject to the comments above we would favour option (a) of those identified by the Borough Council.

### **SO6 Community Infrastructure**

Our clients appreciate that there is a need to ensure that there is an appropriate range and distribution of community and other facilities to meet the needs of residents, and in this context support its provision as part of the process of regeneration and development that is now being planned for. The provision of additional physical infrastructure requirements that arise as a direct consequence of future development would also be considered to be a necessary provision in these terms. In consequence we support the co-ordinated provision of necessary community and other infrastructure as part and parcel of the development process.

However, care must be exercised to ensure that, where such facilities are to be sought, they are necessary, appropriately located, and can be funded from sources other than simply by contributions from new development. Care must also be exercised to ensure that the information that is to be required of the development sector in making any application is not excessive, but is targeted at a genuine need for such information. It follows that a blanket approach to such matters is inappropriate, and that the needs should be judged on a case-by-case basis.

Subject to the comments above we would favour option (a) in terms of the provision of community infrastructure; option (b) in terms of retention of such facilities. Of the other options indicated we do not believe that there is any merit in adopting the sort of prescriptive approach to such matters as these imply. It instead requires consideration on a case-by-case basis.

### **SO9 Green Infrastructure**

The desire to preserve and, where possible, enhance landscape and nature conservation interests as part of a network of multi-functional green spaces in urban areas, the countryside in and around towns, and the wider countryside, is an admirable aspiration and is supported by our clients.

Within this context a comprehensive allocation of the North-East Gravesend area would enable the creation of an interlinked series of Green Infrastructure spaces that will define and contain the wider development. In doing so it will provide much needed links to the Canal and its long distance footpath, as well as to the wider countryside, for a part of the Borough that is currently poorly served in these terms. It can also aid in the preservation and enhancement of SSSI and other areas that are considered to be of ecological value.

That said, there is a risk that Green Infrastructure considerations can be developed to such an extent that they lead the development process rather than inform it. This would be detrimental to the process of securing the development that is essential to meet the strategic growth needs of the Borough, as it places a weighting in favour of such provision that can limit site choice.

In light of the comments above we would favour option (b) of those identified by the Borough Council.

### **SO10 Transport And Air Quality**

Our client fully supports the aim to ensure that regeneration is based on an integrated approach to the delivery of development and transport infrastructure. The regeneration and redevelopment of North-East Gravesend with a comprehensive mixed-use development would, as explained elsewhere, facilitate improvements and additions to the highway network that would aid in the realisation of the wider redevelopment of both North-East Gravesend and the Canal Basin areas.

Moreover North-East Gravesend is well located in relation to existing nodes of public transport, offering reasonable accessibility to the town centre and its related services and facilities. This will improve with the extension of Fastrack, which will run within 400m of the site, and will offer high quality, reliable and frequent service to local residents wanting to access other parts of the urban area.

As with all such matters, funding of new transport infrastructure is a difficult problem, and one that has troubled the planning system for many years. In our view the critical considerations in this context is that whatever system is adopted it must be simple in its form, clear in its purpose, soundly based, and reasonable in any charge that may be imposed. Critically, it must also be certain in its implications and have an acceptably long shelf life, bearing in mind the relatively long lead times that can be involved in securing and promoting land through the development process.

In light of the comments above we would favour option (a) in relation to the form of development that is best suited to delivering the necessary infrastructure and the housing/employment balance; and option (d) in terms of the management of air quality. We have no preference on the options offered in relation to the funding issue beyond the requirements set out in our comments.

### **SO10A Town Centre- Transport And Major Sites**

The recognition given to the possibility of significant benefit arising as a consequence of providing a new bridge linking Dering Way with the Canal Basin site is welcomed by our clients. In that context, however, it is essential that the role that development at North East Gravesend will play in securing this component of new infrastructure, and in ensuring that the potential development capacity which this releases is fully realised, is similarly acknowledged and planned for.

It is also noted that there are potentially further benefits to be realised from such a measure, in terms of the ability it offers to redistribute traffic within and adjoining the town centre potentially allowing the diversion of Heavy Goods vehicles away from the town centre area with, among other

things, significant air quality benefits. Our clients strongly support this proposition and are willing to assist in funding the creation of that link from the proceeds of the comprehensive development of North East Gravesend area within the sort of comprehensive development strategy that has been outlined elsewhere in these submissions.

Subject to the comments above we would favour option (a) in relation to the transport quarter. We have no views that we wish to express in relation to the other matters addressed under this topic.

### **SO11 Climate Change, Sustainable Development And Renewable Energy**

Our client is generally supportive of the Council's aspirations regarding energy conservation and the production of energy from renewable resources. However, we agree with the conclusion drawn under the heading "Sustainability Implications" that an appropriate balance must be struck in order to ensure that economic, social and environmental outputs are optimised.

It is also necessary to recognise that the ability to respond effectively to demands for reductions in energy use and the micro-generation of energy from renewable sources is limited by the fact that the technology required to meet such demands are unproven in a number of key areas. Additionally, the legislative framework within which we are working is an evolving one, in which aspirations often outstrip the ability to deliver. In these circumstances it is necessary to adopt a flexible, target based, approach in order that any policy is able to respond to changing circumstances over time without the need for constant updating and revision.

We would favour the 'Proactive' option proposed by the Borough Council, but with the proviso indicated in our comments above.

### **SO12 Location of New Development And Managing Flood Risk**

The need to deliver development in a manner that avoids flood risk is fully understood. Additionally we acknowledge that PPS25 promotes the adoption of a sequential approach to site selection, with previously developed land being developed first wherever that is possible. Whilst this is an understandable approach, recognition needs to be given to the fact that in making the best use of existing infrastructure investment, and in order to secure the delivery of the Canal Basin site – which sits at the heart of the Boroughs wider strategy for this part of Gravesend - it may be necessary to allow the release of some greenfield sites to achieve wider policy objectives.

Additionally, it must be recognised that a very large part of Gravesham Borough is subject to flood risk, particularly from a breach in the sea defences that lie along the banks of the River Thames. It must also be recognised that the standard of these defences is exceptionally high, in large measure mitigating the risk from flooding in real terms.

In light of this an acceptance that, flood risk notwithstanding, development can come forward where the risk of flooding can be adequately managed, is viewed as a logical and pragmatic response, and one which should be accorded due weight, in line with the Borough Council's commentary on this issue as set out in SO1.

Subject to the comments above we would favour option (a) of those set out by the Borough Council in the Issues and Options document.

### **SO14 Thames Riverside**

Our clients acknowledge and endorse the Borough Council's desire to utilise the Thames Riverside as a key asset in underpinning the regeneration of the area. In particular we note the suggestions that the Canal Basin be completely transformed by creating a new quarter that is well related to the River Thames and complements both the Riverside Leisure Area and Gravesend Town Centre whilst adding to the potential tourist offer of the town.

However, it must be recognised that vehicular access to the Canal Basin area is limited, and that this in turn limits the amount of redevelopment/regeneration achievable without first overcoming the access constraints. As we have discussed elsewhere in these submissions, the solution to this problem is to extend Dering Way north across the railway and canal to provide an access to the Canal Basin with sufficient capacity to serve the intended uses. This would connect with an eastwards extension of the recently constructed Dalefield Way, bypassing Lion Roundabout to ensure that this does not act as a constraint on the capacity of the new link to serve the Canal Basin and North East Gravesend area.

This would achieve the stated aim of regeneration/redevelopment of the entire Canal Basin, while at the same time allowing the full potential of North East Gravesend to be realised, and if structured appropriately could, through associated development, generate a substantial component of the funding required to provide the key additional infrastructure that would be required. This should be recognised in any policies that relate to the Canal Basin Area and the Thames Riverside generally.

### **SO15 The Countryside**

Our clients broadly endorse the key objectives that have been identified by the Borough Council, though it is felt that they are in too many instances stated as absolutes, which may make any conditional relaxation of the objectives more difficult to accommodate.

From the Borough Council's commentary on key issues this concern appears to have been recognised, at least in part. A similar degree of flexibility in how all these objectives will be realised should, however, be incorporated in any subsequent policy dealing with such issues. In doing so, however, we would suggest that it is insufficient to adopt a negative stance that aims simply to preclude certain uses or activities. While this has its place it is equally necessary to provide a positive framework within which the desired change can occur either in its own right or as part of a wider plan or strategy for the area, including new development where that will assist in meeting the wider aims of the areas strategy.

In light of the comments above we would favour option (a) as the better means of protecting and enhancing the countryside and in addressing the problems associated with the rural fringe areas. We have no views that we wish to express in relation to the other matters addressed under this topic.