

Gravesham Local Plan

Regulation 18 Stage 2 Consultation

Firstly, Higham Parish Council wish to express their disappointment at the way this consultation is taking place and the difficulties which Gravesham Borough Council (GBC) have placed on those wishing to comment on the Consultation:

1. The documents are only available online, although a significant proportion of this parish and, we understand, other parishes have very poor broadband speeds meaning that residents cannot download or access documents
2. A significant number of residents do not have the relevant IT hardware, software or skills to access the documents.
3. Libraries are shut so that hard copies are not available
4. GBC have refused to supply hardcopies to those residents who have requested them putting some disabled at a disadvantage.
5. GBC have not made a drop in facility available.

We believe that the above mean that the consultation cannot be seen as being open and fair, nor encouraging the residents to take part. Any conclusions drawn from the current consultation therefore must be 'tainted'.

The "Part 2, Development Management Policies Document" (the "Part 2 document") should be amended so that it reflects in all aspects the "Part 1, Local Plan core strategy partial review and site allocations" document (the Part 1 document") and our comments below. At present, it does not appear that the Part 2 document fully reflects the Part 1 document and, indeed, seeks to change the Part 1 document. It should be made clear that the Part 2 document is subsidiary to the Part 1 document, which takes priority.

Responding to the individual questions posed:

Question 1: What services and infrastructure would you want to see delivered to meet the needs of an expanding population and an ageing population, and where?

There should be an increase in the provision of Care homes, assisted living facilities, Doctors' surgeries/health centres, hospital facilities, etc commensurate with an aging population. There should be an increase in facilities for leisure activities for an increase in the number of retirees. The fall in school age pupils is not expected to happen for a decade and then only marginally. The plan should not be predicated on an anticipated fall in the number of school age children. Additional

primary and secondary schools should be provided as part of, or prior to, any development to satisfy the increase in demand arising from the population increase. Provision of College facilities should also remain at least at the current level. The needs of those wanting to 'downsize' as they get older should also be met by ensuring that there are sufficient bungalows and similar housing available in the community. At present, all too often Gravesham BC seem to consider that detached bungalows should be redeveloped (or extended upwards) to create large houses rather than being preserved to meet the varying needs of the population.

A number of locations do not have sufficient utility provision to cope with their existing population and such matters need addressing before any development can take place. For example, the sewer in School Lane, Higham regularly overflows resulting in waste water running down School Lane and then down the station approach road. Depending on the volume of water, rather than just jetting up through the slots in the manhole cover, the manhole cover lifts and then other matter, such as toilet paper escapes as well.

The proposals envisage a significant expansion within the parish settlements, apart from the sewer capacity, there is also the lack of capacity on the roads between Higham Station and the A226 and between Higham station and Chalk via the "lower road" (Chalk Road, Lower Road, Lower Higham Road) and Higham Station and Town Road Cliffe (B2000) via Chequers Street and Lower Rochester Road. The latter is the signposted HGV route but is less than 2 vehicles wide except where there are "informal" passing places and there is nothing stopping HGVs driving through the village (which they do many times a day) and find it difficult to negotiate with service buses, narrow roads and residents' parked cars (not having off road parking). This is dangerous past the school and bollards, etc which have been placed in the village to keep pedestrians safe and vehicles off the pavement are often broken or knocked over as a result.

Question 2: Do you agree with retaining the current Local Plan Core Strategy Vision? (Please explain your answer by providing additional detail where possible)

While it is good to have a challenging vision of where the direction of travel will lead, the proposed timescale "by 2028" is overly optimistic, especially with recent events. Also, some aspects may no longer be appropriate. Trying to decide these matters with any certainty in the midst of the current changes is unrealistic. While there will need to be significant changes to some aspects, it is too early to quantify with any certainty the amount of change and where. These need to be comprehensively reviewed in the first half of 2022, when some clarity and certainty may be possible.

Before 2020, it was already evident that the nature of retailing had shifted fundamentally, with a large reduction in demand for shop units and a number of retailers ceasing to trade (or only retaining a presence on line;) Therefore, the previous relationships between number of households and demand for retail units had ceased to hold true. The events of the last twelve months have accelerated this process to the extent that the only uncertainty is how much smaller the retail area of the town be in 10 years' time - 25%?, 50%? It certainly will not be larger.

The plan should identify which parts of the retail area will be developed for residential purposes. While accepting that the town centre needs improving and agreeing with the vision that "[r]egeneration and development will have conserved and enhanced the Borough's rich historic built environment", we would want to see an early start on town centre sites and limiting the majority of buildings to 3 or 4 storeys in order not to overshadow the historic environment. Trying

to preserve buildings for out of date uses will detract from the vibrancy and vitality of the town centre and its economic viability.

The Vision and Plan should be modified to cater for and address the increase in 'Working From Home', which large employers seem to expect to become a permanent feature of the way in which they arrange their office based staff. Indeed, some large employers in London are already changing their accommodation requirements to reflect this.

Question 3: Do you agree with retaining the current Local Plan Core Strategy Strategic Objectives with minor amendments? (Please explain your answer by providing additional detail where possible)

In general, it is unclear that these fully reflect the latest version of the National Planning Policy Framework (NPPF). The majority of the policies appear to still be broadly fit for purpose and we comment on them as set out below:

SO1 Make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre, and at Ebbsfleet. **Retain**

SO2 Provide sufficient new homes to meet the future objectively assessed needs of the Borough's population, to include provision of affordable homes, homes for smaller households and older people, and sites for travellers within the urban area and rural settlements inset from the Green Belt. ***This should be modified so that the 'assessed need' is specifically related to the predicted increase in population from 106,722 to 109,500 persons as shown in table 3 of the Regulation 18 document, giving rise to an anticipated need of 405 dwellings a year not the 655 a year adopted for the purpose of this report. All pre Brexit population growth estimates, relying as they did on assumed net inward migration from the 'EU27', have proven to be too high in actuality.***

SO3 Ensure that the right amount, size and type of employment sites are available in Gravesend and Northfleet to diversify and strengthen the local economy and reduce out commuting. **Retain**

SO4 Support existing neighbourhoods and create a number of new residential neighbourhoods, mixed use areas and employment areas along the Thames Riverside at Gravesend and Northfleet and on land at Coldharbour Road. **Retain**

SO5 Create a mixed use community at Ebbsfleet including a sub-regionally significant office based employment hub in the longer term, to provide further jobs. **Retain**

SO6 Enhance the role of Gravesend town centre as a public transport hub and as the main location for retail, leisure, culture and offices whilst preserving and enhancing its character as a riverside heritage town. **Modify to reflect NPPF including paragraph 85.**

SO7 Enhance the Borough's public transport network to serve existing and new neighbourhoods and communities in Gravesend, Northfleet and Ebbsfleet. **Retain**

SO8 Preserve the openness of the Green Belt, maintain its national and local planning purposes and protect it from inappropriate development. **Modify, the problem with this statement is "inappropriate". Development should only happen if it is to preserve or enhance existing settlements (eg by improving sustainability) or businesses. If "inappropriate" is retained in this Objective, then it should be defined/explained that it is being used as defined in paragraph 145 of NPPF.**

SO9 Conserve and enhance the diverse rural landscape including the Kent Downs Area of Outstanding Natural Beauty and its setting. **This statement needs enhancing as it currently ignores the North Kent Marshes, which are at least as important and there appears to be no policy about supporting, maintaining and enhancing the agricultural businesses within the Borough, which is a significant omission.**

SO10 Safeguard and where possible improve existing employment sites. **Retain**

SO11 Seek to retain and improve the provision of existing services and facilities and ensure that sufficient facilities are provided to meet the needs arising from new development. **Retain**

SO12 Safeguard and where possible enhance the retail character and function of the Borough's town centre and local centres. **Retain but acknowledge that (a) Gravesend town centre will only ever 'play second fiddle' to Bluewater and (b) the overall amount of retail space needed will reduce over the plan period.**

SO13 Protect and enhance the Borough's heritage assets and historic environment. **Retain**

SO14 Ensure that all new development makes a positive contribution to the local character and distinctiveness of the Borough, minimises the risk of crime, responds to climate change, and integrates into the existing built, historic and natural environment. **Retain**

SO15 Improve opportunities for recreation, sport, walking and cycling. **Retain**

SO16 Safeguard and enhance the biodiversity of the Borough. **Retain**

SO17 Increase accessibility, reduce the need to travel, minimise congestion and improve air quality through the improved provision of local public transport and the provision of local jobs and services. **Retain, however we notice that bus routes subsidised by the Council are using older buses with higher harmful emissions. The Council should lead by insisting that 'improved provision' relates to the type of vehicle used as well as frequency.**

SO18 As a minimum, safeguard the capacity of commercial wharves and other sites needed to support the River Thames as a working waterway. **Retain**

Question 4: What would you improve about the Borough as a place to live, work, shop and undertake leisure activities? (Please explain your answer by providing additional detail where possible)

Encourage independent traders, improve the vitality of the town centre by ensuring that shops are clustered together rather than spread out as they are at present. A lot of empty buildings and charity shops detract from the town centre and owners should be encouraged to bring them into an economically active use. Also, car parking charges in the town centre encourage shopping activity elsewhere.

There should be more and better studies on air quality which has been totally ignored in this consultation. This should not just consider emissions from internal combustion engines but particulates from tyres, brakes etc (often higher from electric vehicles).

The rural parishes, and Istead Rise and Chalk, should have their biodiversity increased to encourage pollinators and other flora and fauna, in accordance with national policies and those of Kent County Council. Narrow corridors are not necessarily appropriate as wildlife tends to require food and other resources within a certain radius of its nest and not a linear corridor.

Question 5: Should the Local Plan Partial Review's housing requirement follow the Government's standard method formula, including taking into account unmet needs from neighbouring authorities?

NO

Question 6: If your answer is no, please set out why you think this and what different methodology should be used and why?

Given that the population growth figures used to determine the government's projected housing needs have not been met as far as Gravesham is concerned and the latest projections are significantly lower than the pre Brexit referendum projections, the future provision of dwellings should reflect the current population growth estimates and not previous estimates which have proved in reality to be ridiculously high, eg even the 2016 estimate for 2020 is for Gravesham to several thousand more residents than it actually has.

Rather than base the estimated housing need on out of date 2014 projections the latest information should be adopted. Expert commentary from Nathaniel Lichfield & Partners (Lichfields) "How many homes? The new Standard Method" published in 2020 (<https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/#section9>) suggests that rather than a demand for 655 dwellings a year for the next 16 years the required level to meet inward migration and household formation is only 405 dwellings a year, so 6,480 in total not 10,480. Although the government reconfirmed the target number of 655 dwellings per annum at the same time as publishing its Consultation response on 16 December 2020, it describes the number as "All figures presented are based on data available at the date of publication and should not be considered as definitive for local

planning decision or plan making as the inputs to the standard method are variable and not fixed.”

There should not be an automatic assumption that a deficiency in one area should be met by surrounding areas, however given the location of Ebbsfleet straddling Dartford and Gravesham, it is logical that these two planning areas should coordinate and work as a unit in identifying housing need and provision. Please also see our response to Question 27.

Question 7: The current Housing Market Area boundary (Figure 7) is based on recorded trends. Do you have any evidence to suggest that the Borough’s Housing Market Area may have changed since the Strategic Housing and Economic Needs Assessment was undertaken? If you do, or if you disagree with the boundary set out in Figure 7 please state why and provide evidence to support an alternative boundary.

There has always been some fluidity between Dartford, Gravesend and the Medway Towns although the key relationship has been Dartford and Gravesend (and the settlements along the river in between) and in many respects it makes sense to recognise this. However, as stated above, because of Ebbsfleet, there is now much more sense in treating Dartford and Gravesham as one, rather than including Medway. A key purpose of the Green Belt between Gravesend and Strood is to stop ‘ribbon development’ along the A2, the A226 and the unclassified Lower [Higham/Rochester] Road drawing these two towns together. The gap between Gravesend and Strood is the first significant open area on the Thames frontage east of London. It is a much narrower ‘green wedge’ north of the A2 than south of it and thus it is much more important that this area of Green Belt is preserved and not developed.

Any unmet need in Medway should not be used as an excuse to fill in this key break in the urban area and allow the wider London area to spread east of Gravesend in contravention of a primary purpose of the Green Belt. A primary purpose of the Green Belt is to stop settlements merging, which also suggests that Medway should be treated as a separate housing area.

Question 8: Should the Borough Council require developers to specifically meet the needs of specific groups such as the elderly? If the answer is yes, how would this be achieved?

The council should ensure that there is a wide range of dwellings provided to meet all types of demand. In doing so it needs to consider the economic viability of proposals eg at Nelson Court values are now 25-30% below the levels of the early sales in 2009. It should also discourage ‘vanity’ projects such as high rise buildings in situations where the financial considerations do not justify them. It also needs to recognise that ‘the Elderly’ are not a homogenous whole but as diverse as the rest of the population. Some may be happy in small one bedroom bungalows but others will want larger premises so that they can have family to visit and a garden to maintain. As demonstrated in 2020, both of these can result in significant improvements to mental health (with consequent reduction in demand on NHS and social care services.) Older people do require dwellings with easy access to convenience shopping.

Question 9: Would you like to see more first homes and homes for older people built across the whole of the Borough?

The provision of homes should reflect the demands of residents, not a prescribed set of ratios. See answers to questions 8 and 10

Question 10: Should the Borough Council be prescriptive in terms of the mix, size and type of housing that should be delivered in the Borough, or should Borough Council continue to provide flexibility to Developers so that they can respond to changing market demands and economic realities? If the answer is yes, how would this be achieved: a single mix, size and type requirement for all sites or a range of requirements for different categories of site?

While government policy has distorted the types of dwellings which have been provided over the last decade, the Council should not try to second guess the proportion of different types of dwellings which will be required over the next decade or two. With more people expected to 'Work From Home' in the coming years, there will need to be an increase in the provision of larger dwellings which afford an 'home' office and/or larger gardens so that a garden room can be installed by an owner if needed.

Question 11: Should the existing approach to density standards in the Borough be changed? If it should, what alternative approaches should be considered?

The existing standards should remain, although in rural areas, developments should reflect existing density patterns.

Question 12: Should higher density development be sought in close proximity to rural train stations (i.e. Higham, Meopham and Sole Street)?

Given that Higham Station is in Lower Higham which is classified under "Other Settlements" in the Adopted Local Plan Core Strategy of September 2014, increased density would be inappropriate.

Question 13: Should the Borough Council continue to seek up to 30% of new homes as affordable housing in the urban area and up to 35% of new homes as affordable housing in the rural area? What evidence do you have to support your view?

Higham has two recent examples of Affordable housing development both of which are on Green Belt land near the station. The first, Jupp Court is next to the railway station and has no constraints on who may occupy it. While it was claimed this would help those in the village, in fact houses were allocated on a needs basis without regard to any connection with the village (or even Gravesham). The second was associated with the development of the former Chequers public house. Houses here were reserved for those with residency or work connections to the village. As these are both in Lower Higham, neither are near a shop, pub or other facilities.

Question 14: Should the Core Strategy thresholds for the provision of affordable housing be changed? What evidence do you have to support your view?

The current proposals seem about right, although we do not understand the logic in treating the urban area so differently from the rural areas. A lot of local authorities adopt around 30% (eg London). If brownfield sites have a lot of abnormal costs then, based on financial viability, there should be some flexibility to vary the affordable provision.

Question 15: Should the Borough Council apply the existing affordable housing requirements to Built to Rent schemes?

Yes. Build to Rent is not a separate use class and so does not justify any different treatment. Whether part of the provision is provided under covenants binding the land or via a Registered Social Landlord is of lesser import.

Question 16: Given the affordability issues in the Borough should a greater mix of sites be identified to boost supply and affordability. With land allocated to also deliver a proportion of the Borough's housing needs on smaller sites?

Generally, Affordable Housing should be provided near to settlement facilities and public transport. Smaller developments allow the creation of a mixed community. In addition, this allows the creation of self supporting smaller communities within larger areas, rather than forcing a lot of travel (eg carers may live closer to their clients as a result).

The experience of Ebbsfleet seems to be that given the current levels of house prices elsewhere in London and the Home Counties, the current levels of house prices in Gravesham are such that they encourage inward migration. Provision of more dwellings at cheaper levels is unlikely to benefit local residents but increase the level of inward migration, while reducing house prices in London.

Question 17a: How and where should the needs of Gypsy, Traveller and Travelling Showpeople be met in the Borough? For example, should provision be made as part of land allocated in the rural area for housing?

Question 17b: Do you agree with the methodology utilised for the recent GTAA and the household need identified? If you do not, please provide alternative evidence

Question 17c: How should the need for travellers who do not meet the Planning Definition be met and those whose need could not be quantified i.e. unknown?

Question 18: Should we continue the current approach to protecting existing employment areas? If not, what evidence do you have to support your view?

There needs to be proper provision of and allocation of employment land. Given the density of use in the area between the Canal Basin and Denton Wharf, there is obviously an unmet demand for basic surfaced yards and buildings. At present, there appears to be less demand for retail and offices in Gravesend, or indeed elsewhere in London and the South East. It is noticeable that those local authorities which have a higher proportion of their residents in 'office' jobs (whether or not they actually work in an office), tend to have a wealthier population.

Question 19: Should we be allocating more land to meet the Borough's employment needs and to attract greater investment to the Borough, to try to ensure that for every 16-64 year old resident in the Borough there is a job opportunity available?

This question and the next few seem to imply that there are 'Good' and 'Bad' jobs. Gravesham should ensure that there is sufficient land to meet demand, whether this is to undertake activities similar to those in Wharf Road, or Lidl's distribution warehouse, Kimberley Clark's factory or offices in the town centre is immaterial. Given that for more than a century, people have commuted from Gravesend to London, as well as other, nearer locations, such as Dartford Borough Council's area or Essex, it is unrealistic to expect all those who live in the Borough to work in the Borough, which leads to a myopic, introspective community.

The Council should investigate the provision of a business hub in accordance with government policy.

Question 20: What provisions should be made to promote micro and small businesses in the Borough and to encourage people to work from home?

There is already some provision of small office provision in the Borough, eg Kent Space at Springhead and the upper parts of retail units could also become available, however this needs to be of sufficient quality and not just low grade upper rooms in Victorian buildings.

To facilitate the increasing trend towards Working From Home, at least several days a week, dwellings need to be large enough to have a suitable office space and/or gardens need to be large enough to incorporate a suitable timber room for such a use. The Council also need to work with providers to ensure that mobile phone and broadband services are provided to the highest standard throughout the Borough.

Question 21: Should the Local Plan be making provision for greater and better paid job opportunities for all residents and especially lower paid female residents of the Borough?

A lot of traditional part time employment opportunities which are often taken by female residents have traditionally been in the retail, leisure and hospitality and care sectors all of which at this

time are going through fundament change. GBC should be working with Locate in Kent and the Ebbsfleet Development Corporation to attract higher paid jobs. However, this will also require suitable housing for those working in such jobs, which is likely to mean more executive housing than currently provided.

Question 22: What measures should be undertaken to reduce levels of out commuting?

As stated above 'Out commuting' has been a feature of Gravesend for over a century. The current level of house prices seems to be encouraging inward migration by those working in, or closer to, central London which means that it increases out commuting. The only way to reduce out commuting is to encourage those employing higher paid workers into the borough. To the extent that workers earn money elsewhere and then spend it within Gravesham improves the local economy. Gravesham's economy is currently supported by out commuting, without which it would be much poorer.

Question 23: Should the Borough Council continue to focus retail, leisure and recreation growth towards Gravesend Town Centre, are there any areas of the Borough in need of retail and leisure floorspace to support the local area and sustainability?

Yes. The Council should focus non local, convenience, shopping in the town centre as well as some hospitality activities.

The Council should recognise the increasing move to online expenditure and although total expenditure may increase the amount spent in physical stores is declining. The closure, liquidation and major changes to a lot of large retailers in 2020, building on a trend that started several years ago, shows how much retail activity has moved online (currently between 25 and 35% depending on the month) (including food retail which is only 10%) as does the amount of surplus space there is within shopping areas. The dramatic fall in rental levels also points to a fundamental lack of demand. The policies in the Part 2 document relating to the town centre need rewriting to reflect current reality and government policy as set out in the NPPF.

Question 24: In light of the Government's changes to the Use Class Order and Permitted Development Rights, should the retail core of Gravesend Town Centre be protected, or should it be diversified to encourage a greater range of uses?

The retail area and the town centre in general should be allowed and encouraged to transform into something which meets the needs of current and future generations and not be anchored to the outdated historic needs, which are no longer relevant. Stopping buildings being used for their most economically beneficial use only deters business from locating in the Borough and leaves the so called protected area as a poor quality, deteriorating environment discouraging visitors. This means that it can be anticipated that the provision of physical shops should be reduced and other uses encouraged, including conversion to residential. The changes to the Use Classes Order appear to be designed to encourage a lot of deteriorating or stagnant town centres to transform into vibrant locations again. Some shopping centre of similar age to the St Georges Centre and Thamesgate are already being demolished because of the changing retail environment.

The Council should be planning for Parrock Street and all buildings east of Parrock Street to cease to be retail and similarly no town centre retail south of the railway line or west of Darnley Road. The High Street north of the Old Town Hall also should cease to be retail. It is likely that this will still result in an over provision of Town Centre accommodation and further reductions will be necessary. Hospitality and leisure cannot be expected to take up all the released space. A lot of the current buildings in this area are not suitable for use as offices.

Question 25: Is the Borough Council's revised settlement hierarchy approach suitable? Please provide details.

We disagree with the reclassification of Lower Higham from being in the former "Other Settlement" category to being merged with Higham (Upshire) and both becoming a "Larger Villages". Lower Higham is much more rural in nature. We also object to Meopham Green and Hook Green Meopham being merged to a single settlement. We believe that the 2014 settlement classifications and boundaries are robust and should be respected. The redefining of these settlements as proposed is against the national policy as set out in NPPF.

Redrawing of Settlement boundaries should be limited and only relate to existing buildings, not potential development sites.

Question 26: Are we right not to consider how the changes in technology impact of the sustainability of rural settlements? Or should we update how we assess settlement sustainability?

We do not think that the Council should adopt policies which actively detract from some settlements, effectively allowing them to 'wither on the vine'. While it might be appropriate because of the road network to restrict development in say Luddesdown or Harvel, other locations are not so constrained and, from a sustainability point of view, might benefit from some development. Mobile telephone coverage and broadband speeds are key considerations for a lot of residents and potential residents when making house choices and should be factored in when considering suitability of settlements. The Council should be working with providers to enhance the current provision.

Question 27: Should the housing requirement for the Borough be broken down so we can understand the specific individual housing need requirements for the urban area, parishes and Istead Rise?

Yes. Housing needs to be provided where it is needed and not randomly located forcing additional commuting, family dislocation etc. However, purely based on projected increase in resident population and the study by Lichfields referred to above, there is more than sufficient capacity within the urban area, without the need to develop any Green Belt sites.

In "Government response to the local housing need proposals in changes to the current planning system" document published on 16 December 2020, the government states "we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places" and then goes on to say "A number of the concerns we have heard showed some

misunderstanding about what was being proposed”. Then expanding on this point, it says “Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints”

Based on the above it would appear that by proposing to build on the Green Belt, Gravesham Borough Council, like “many respondents” have taken the previous numbers from the government as a mandatory “target” and not as an advisory starting point, which then needs to be adjusted based on other factors. Any proposals affecting the Green Belt should strictly follow the provisions of paragraph 145 of the NPPF.

Question 28: Which redistribution approach do you consider to be the most effective (A, B, C or D)? Are there any alternative approaches that should be considered?

Should any development within the existing Green Belt be necessary, the focus should be on option D, ensuring that the least amount of Green Belt land is taken and that all existing settlements are sustainable.

In addition, the distribution should also take into account the infrastructure outside the urban area. Rural roads are busy and often congested with vehicles only able to pass at specific points often requiring vehicles to partially or wholly to leave the surfaced area, sewers overflow, electricity supplies fail periodically. This all needs to be taken into account in assessing suitability.

Question 29: Do you support the formation of Neighbourhood plans, should the council encourage their establishment by local communities? If yes should the council actively help with this?

Communities can only prepare Plans in the detail needed with the full financial support; and help with specialist expertise and specialist studies at a Borough level, which would need to be commissioned by Gravesham Borough Council. The provision of Neighbourhood Plans should not be seen as a cost cutting exercise by Gravesham Borough Council, indeed the cost of preparing Neighbourhood Plans as well as a Borough wide Plan can be expected to be more costly than just a Local Plan. The full costs of the Neighbourhood Plans should be a Borough Council cost.

Question 30: Do you agree with these criteria? Are there any changes or additional criteria that you consider we should take into account?

We disagree with the criteria set out at 1.9.13. The Local Plan should strictly follow the purposes of the Green Belt in the National Planning Policy Framework (NPPF) as set out at paragraph 134 and the definition of inappropriate development set out in paragraph 145. The primary purposes

of the Green Belt are to stop urban sprawl and the merging of settlements, safeguarding the countryside from encroachment and assisting urban regeneration by encouraging the redevelopment of brownfield land. The Green Belt sites within Higham are also Grade 1 and 2 agricultural land which under national policy should be preserved from development.

GBC should follow the provisions of the response document of 16 December as highlighted in Question 27 and respect the constraints created by the Green Belt.

Redrawing of Settlement boundaries should be limited and only relate to existing buildings, not potential development sites.

We strongly disagree with the Proposed Policy AG1 insofar as it allows the Council to allocate high grade agricultural land as a Development Site and thus be exempt from the policy. As stated above, the preservation of high quality Agricultural land is of national importance and the Local Plan and its policies need to reflect that.

Question 31: Should the Council continue with the Local Plan Core Strategy's existing approach of ensuring existing settlements do not merge? If not, why?

Yes and this should relate to the 2014 settlement boundaries, in order to stop the urbanisation of the rural area and to comply in all respects with the requirements and provisions of NPPF.

Question 32: Do you have any views in relation to the sites identified in meeting the Borough's needs so far?

We only feel competent to comment on those sites within Higham parish or which abut the parish boundary. We believe that, in accordance with national policies, the highest grades of agricultural land should remain in agriculture to help feed the UK population and or grow biological crops. The map of England showing the land classifications on the DEFRA part of the government website shows that the agricultural classifications of Grade 1 and Grade 2 form a relatively small part of the total agricultural area of the UK. The Green Belt study prepared for GBC ignored the quality of the land for agricultural purposes, which seem to be an omission. All agricultural land within Higham which has been identified as potential development sites is classified as Grade 1 or Grade 2. In addition, development of these sites would be harmful to wildlife and pollinators contrary to Kent County Council's policies. These sites are important in creating a distinct green gap between Gravesend and Medway, which should be strictly maintained in accordance with NPPF as stated above.

While on a proportionate basis in Table 18, Higham is shown as being 19.55% of the rural area, the proposals more than double the number of dwellings in the parish, demonstrating the irrationality of the proposals.

***GBS -K** Land between A2, Watling Street and A226, Gravesend Road incorporating the Three Crutches. As well as destroying existing sports facilities, the site effectively joins Strood with the outskirts of Higham village. The development of this land has been identified as causing a high degree of harm in the Council's own report prepared by LUC "Gravesham Stage 2 Green Belt Study" August 2020. The land forms part of the Higham Agricultural Farmland in the Gravesham Landscape Character Appraisal of 2009 and is Grade 1 farmland. The development of this land*

would effectively remove the green gap between Higham and Strood and join the settlements, in contravention of national policy.

GBS – T Recreation ground and adjoining field. The development of this site is inappropriate. The Council's policies as set out are to improve and enhance sports facilities (SO15) not to build on them. Within the Green Belt Study, the development of this field is classified as causing High levels of Harm. The land forms part of the Higham Agricultural Farmland and is Grade 1 and 2 agricultural land. Development of this site would cause increase in traffic on the already congested School Lane with access opposite or in close proximity to the Primary School. This site would join the two settlements of Higham and Lower Higham contrary to a primary purpose of the Green Belt. The shops and pubs in Lower Higham have been closed and redeveloped over the last 20 years. There is insufficient utility provision to service the development as evidenced by the overflowing sewer. Higham school would need expanding to cope with additional pupils and the health centre would need expanding to cope with the additional residents. The road network is insufficient to cope with any extra traffic generated.

GBS – W Land between School Lane and Taylors Lane. Again, this development would join Higham and Lower Higham resulting in a merging of these two distinct settlements. The road access via Taylors Lane is insufficient and there are few opportunities to access this land via School Lane as it is mostly back land. The widening of the northern end of Taylors Lane and the provision of sightlines would involve the demolition of existing dwellings. There is insufficient provision of utilities and other services in this location and any development would also require expansion of the school and health centre. The development would harm the setting of the Grade II Listed Higham Hall and Higham Hall Barn. The land is part of the Higham Agricultural Farmland and is Grade 1 and 2 Agricultural land. Development of most of this area is described as causing High levels of harm with the already developed areas and their vicinity given a Moderate harm rating. The southern parcel of this site is elevated on a ridge and any development of this portion would be intrusive on the skyline. The shops and pubs in Lower Higham have been closed and redeveloped over the last 20 years. Apart from the existing traffic congestion in the centre of Higham, the junctions of Taylors Lane and School Lane and then School Lane with Forge Lane and Villa Road could not cope with the traffic from an additional 335 dwellings which the proposed development of these two School Lane sites is claimed to produce. There can be no assumption that most residents would travel by train to London or elsewhere (which would also be against other parts of this Local Plan Partial Review) and the current bus service is intermittent and does not go direct to likely employment areas with the first bus from Higham at 8am, a later bus at 9:30 and the last bus leaving Gravesend at 15:55. Developing in the village will increase vehicle traffic and detract from the Council's laudable aims concerning climate change.

GBS – C Buckland Farmyard and adjoining land. The farm buildings are and have been let out as commercial units for small businesses. This use should not be terminated until alternative accommodation is provided in the immediate vicinity. The land is in the Green Belt and although development of part is describe as forming only Low Moderate harm to the Green Belt (presumably because part of it is already developed and used by business) the adjoining Green Belt area to the west of the farmyard is described as suffering Moderate High harm were it to be developed due to the relationship with the farmland beyond. This area is also part of the Higham Agricultural Farmland area, Provision should be made for relocating businesses to alternative accommodation in the immediate vicinity before any development of the farmyard is consented. It is important to keep the existing uses of this area as they represent a transitioning of the built up area to the rural area and if this site is developed it is likely that this transitional zone would just move west. The shops and pubs in Lower Higham have been closed and redeveloped over the last 20 years. This development would use the same roads as set out above and add an additional 40

dwellings to the total increase in traffic generators. It cannot be assumed that residents of these new dwellings would use the train to travel.

GB147 *Land at Canal Road. This site is on the narrowest part of Canal Road where the road ramps down from the level of the railway overbridge in Chequers Street to the level of the marshes. Its development is described in the Green Belt study as preventing the encroachment of the settlement into the countryside. This site has the former boys club on part of it and also formed part of a smallholding over several decades, the site has been reclaimed by nature and significant ecological studies should be undertaken before any development potential can be quantified. The shops and pubs in Lower Higham have been closed and redeveloped over the last 20 years. Canal Road is a No Through Road and the only access is via the already congested junction it makes with Church Street, Chequers Street and Lower Rochester Road.*

GB 80 *Land at Walmers Avenue. This is described in the Green Belt study as having a strong visual relationship with the adjoining open countryside. Although on the parish boundary with Shorne, it would effectively be an extension to Higham (as is the remainder of the Hollytree Drive area which used to be part of Shorne). Any development would not aid the sustainability of Shorne but would rely on the infrastructure of Higham, putting pressure on the utilities and infrastructure in the village including the school and doctor's surgery. The Green Belt study states that development of this site would weaken the integrity of the existing gap between Higham and Lower Shorne.*

Question 33: Are there any alternative approaches that the Council should consider?

If the Council adopted the latest population growth predictions, there would be no need for substantial development in the Green Belt contrary to the policy clarified by the government on the 16 December. Rather than pandering to developers, the Council should ensure that the existing Brownfield sites within the urban area are developed first in accordance with National Planning Policy Framework paragraph 134.

Question 34: Should the Council be more specific in relation to defining the Open Spaces that are protected and be more specific regarding future provision?

Yes. We find it perverse that the Council will not list sites in the Green Belt as being 'Open Spaces' due to their already protected status, while simultaneously promoting the removal of some such sites from the Green Belt and thus leaving them with no protection whatsoever.

Question 35: Should the Council designate local green spaces? Do you agree with the local green space criteria identified?

Yes. The NPPF framework as set out in paragraph 1.10.3 of the consultation document are the minimum requirements and should not be further constrained as suggested in 1.10.6

Question 36: Are there any additional sites that should be considered for local green space designation through the plan

making process? If yes, please see Appendix 2 for further information on how to nominate a site.

Higham Recreation Ground should be classified as a Green Space as it provides recreational facilities as a sports pitch and multipurpose hard surface courts plus a children's play area. It is inappropriate to take this space and develop it for housing.

Question 37: What particular pressures do you experience in relation to existing infrastructure, please provide details such as type of infrastructure and location?

We can only comment on Higham.

The doctor's surgery/health centre is part of a group with Cliffe, Cliffe Woods and Wainscott. Parishioners often find themselves directed to one of these other surgeries rather than being able to see a doctor or nurse within the village centre.

We have mentioned above the overflowing sewer. Some parts of the village do not have mains sewers.

We suffer frequent burst water mains in various parts of the village.

Currently, all electricity supply within the village, except for post war developments, is provided by overhead power lines. There will need to be significant upgrading of this supply before any development can happen with the village. Several times a year, parts of the village suffer power outages because of failures in the overhead network.

We have no information as to any unused capacity within the existing water and gas supply pipework.

Large parts of the village still have very slow broadband provision and low signal quality for 4G networks.

Bus services are poor and more so in school holidays, except along the A226.

With the transfer of the train provision to Thameslink from Southeastern, the journey times to London have significantly lengthened, which can be mitigated at times by changing at Gravesend or Dartford. But even so still providing a worse service than previously.

The road system is at capacity in the middle of the village, exacerbated by HGVs using it as a 'rat run'. Traffic studies for recent planning applications for developments in Cliffe Woods state that they will result in more traffic through Higham, as does the traffic study for the Lower Thames Crossing. This study also indicates an increase in traffic on the A226.

The primary school is full and not able to take all applicants. When moving into the village new residents find that they have to send their children elsewhere until a space becomes available.

There are no secondary schools available except those connected by special school bus services.

Question 38: Do you agree with the Council's approach in working with infrastructure providers and other partners to ensure infrastructure is delivered to adequately meet the needs and mitigate the impacts of new development?

Infrastructure as defined in the consultation document should be significantly improved prior to any dwellings being developed. Healthcare should not be limited to doctors' surgeries but also to the capacity and need for the expansion of Gravesend hospital. With 10,000 plus dwellings at Ebbsfleet, and the development of Northfleet Embankment and other areas, Darent Valley Hospital will become ever more overcrowded. The local Councils and NHS should work together to improve hospital provision and other NHS services before significant development takes place in

Gravesham. Gravesend hospital is much better serviced by train and bus, being in a town centre, rather than a car dependent location such as Darent Valley, and so is more sustainable. The Consultation document makes no reference to improving/increasing school capacity and the location of such increased capacity, which is obviously required, given that schools are currently full.

Question 39: Do you agree that the Council should be addressing the Climate Change emergency proactively? If not, why not and what are the risks involved in not taking suitable action at this stage?

The Council should ensure that all dwellings have 2 electric car charging points, unless they are one bedroom units and that new developments meet other low carbon criteria, eg LED streetlights. New dwellings should have solar panels and meet the national insulation and energy efficiency criteria. When encouraging upgrading the energy efficiency of existing dwellings, installing double glazing in wooden window frames for instance should take precedence over Conservation/historic considerations, as should the installation of solar panels. Older dwellings tend to be the least energy efficient and without upgrading those in Conservation Areas, the laudable aspirations of the Council (and the government) cannot be met.

Electric charging points should be provided for those relying upon on street parking.

The Council should replant trees along roads in the urban area, eg Portland Avenue has lost most of its trees, as has Lower Higham Road, Chalk and other roads with sufficiently wide pavements should have trees added, even if they have not previously been planted.

Main roads should have dedicated cycleways not just random white lines creating narrow 'lanes'. As examples there should be a separate cycleway alongside the A226, the joint use pedestrian and cycle path pavements in various parts of Gravesham should be separated for the safety of users

Question 40: Should the Council make provision for large-scale renewable energy generation? The Borough has recognised wind resource, would you welcome wind turbines?

We believe, given the nature of the Green Belt within the Borough that the installation of large wind turbines is inappropriate. It would cause major disruption to the existing RAMSAR and SSSI on the marshes and totally detract from the AONB. Given the large amount of grade 1 and 2 agricultural land in the Borough, the AONB, SSSIs, and RAMSAR sites, we do not believe that a solar farm would be suitable either.

However, linked to a source of energy such as an estuary windfarm, the borough is ideally suited as a location to generate hydrogen for use as a substitute fuel. Given the existing pipelines from the northern shore of the estuary, fuel produced could be distributed to the Midlands and North of England.

Question 41: Should the Council require new development to accord with an energy hierarchy, which in order of importance seeks to minimise energy demand, maximise energy efficiency,

utilise renewable energy, utilise low carbon energy, and only then use other energy sources.

We do not believe that, through the planning system, the Council can specify renewable energy and low carbon energy, unless it is generated on site. Specifying energy sources would encourage developers to 'game the system' by calculating CO2 emissions using renewable or low carbon energy while occupiers might actually buy from suppliers using a less carbon efficient system.

Question 42: Should strategic development allocations be required to make use of decentralised heating and cooling networks?

Developments should be required to make use of energy efficient systems. Depending on the development, decentralised systems may be appropriate. This cannot be the subject of a 'one size fits all' approach.

Question 43: Should the Council require new developments to include a detailed carbon assessment to demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions, where appropriate?

Energy efficiency should be the test, given that the occupier has limited control over how the electricity consumed is generated. In addition, if the test uses low carbon generation bought from a third party, there is no guarantee that the actual occupier will use such sources in the future, negating the test.

Question 44: Should the Council require developers to contribute towards increasing the area of habitats that sequester and store carbon, including through the provision of additional tree and shrub cover within the Borough?

New developments should provide a green environment through the provision of private gardens and open space. Gardens and public space should be landscaped to include trees and hedges.

Question 45: Should the Council seek to deliver net zero carbon development at a faster rate than allowed for by Government Building Regulations?

While this is a laudable aim, the actual result could be to increase construction costs and thus sale prices making dwellings less affordable than they are at present.