



COBHAM PARISH COUNCIL

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EMERGING LOCAL PLAN PARTIAL, REVIEW, SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES (REGULATION 18 – STAGE 2) CONSULTATION

The Consultation

Whilst we appreciate that the current consultation will need to happen, we feel that it has not been conducted in a fair and even manner, allowing and enabling people to easily respond.

- **Material changes to Consultation** – On December 4th a new 'Final' version of the document was published updating a table in section 1.8.13. This amendment materially changed the consultation by changing a fixed number into a percentage allocation, resulting in a change of need from 7.2 dwellings to between 308 – 781 dwellings (based on the total number required). In addition, this change was not communicated and as far as we can see there is no audit trail on the documentation. This material change would impact how people feel and respond to the consultation, but, despite requests from representative, we have had no assurances that those responses received to this date have been communicated – What is the proposed approach to these responses?
- **Transparency** – Throughout the document, it refers to the need and rarely outlines what it has. There was no detail regarding brownfield sites that have already got permission, how many proposed dwellings are in progress or not yet built. This detail, should have formed part of the consultation and supporting documentation, for local parish councils, local residents and interested parties to be able to have a full and transparent view of potential impact.

In setting out his comments in response to the consultation on the standard method for assessing Local Housing Need and the further steps to be taken to increase housing delivery as the country recovers from the COVID-19 pandemic (16 December 2020) Robert Jenrick (secretary of State, MHCLG) stated:

“There were many consultation responses which did not fully recognise that the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for housing in an area. 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 is crucial that planning is more certain and more transparent, so we will explore how we can make this clearer through our longer-term planning reforms, including considering the right name for this approach.”

- **Awareness** – Current efforts by Gravesham Borough Council to raise awareness of the consultation, have been perceived as poor and in cases non-existent. Along with our own efforts, a number of other organisations, such as the CPRE, have raise awareness of the consultation, through social media and letter box drops, but this is still not enough. A combination of the current Tier status and our age demographic (26.1% of Cobham Parish aged 65+ years, this increases to 33.3% aged 60+ years) means that there is no accessibility to the information, as most of this generation will not be proficient on a device that allows access and review to the online information.
- **Mental Health** – The current situation and tier has already impacted the Mental Health of our parish residents. It feels that Gravesham Council has chosen this exact time, in the hope that it will lead to less responses and therefore less resilience to the changes that are being proposed within the consultation. It also, feel that Gravesham Borough Council has acted without due care to its residents through this consultation, creating additional mental stress on an already complicated situation. We would therefore ask, what considerations have Gravesham put in place before launching this consultation at this time and did they factor in the additional Mental Health impact this would cause?
- **Rural Access Considerations** – It feels that little consideration has been made for those residents in rural areas. Firstly, if the residents are proficient and are able to access the documents via the portal, our assumption is that many are not (see awareness), do they have the right technology infrastructure to firstly download, but then also view the documents. Secondly, for those without the technical capabilities or infrastructure, what did GBC think would be the means of access? We are currently in Tier 4, previously Tier 3, this limits the ability to open communal areas and both the Meadow Room and Church have remained closed since March on advice from the Government. No other communal spaces or meeting areas are available, so how did GBC think people would be able to view the consultation if they follow Government guidelines and do not travel, have no access to communal meeting areas usually used to display such material or have the capability to view and assess the consultation documents online?
- **Complexity of Materials** – These documents are extremely complicated for people to navigate. This is evidenced by the fact that even GBC representative, who deal with this type of documentation as part of their role, could not correctly understand the documentation and represent the material correctly (*see Material Changes to Consultation*). The CPC created a simplified guide for Parishioners, to help them understand potential impact and navigate the documentation. In addition, we have had numerous conversations with residents who are asking for help and assistance in understanding and navigating the information within the consultation documents. In addition, we believe, there have been additional changes to documents as well as documents added and taken off the Consultation Portal since the start of the consultation, this would have only increased the complexity.
- However, if GBC can provide evidence that documents were not added, amended or removed from the portal, then we would ask, why they did not publish the tracked changes to provide that transparency and reduce the complexity to those reviewing as part of the consultation?

- **Kent County Council Engagement** – In previous consultations ‘Gravesham Borough Council’s consultation of their local plan Core Strategy 2011’ , Kent County Council identified potential sites, neither of which was Sole Street or Cobham (Section 6.5). In addition. KCC expressed concerns over cost to KCC that had not been factored in. This latest consultation does not factor in cost to KCC or how it intends to pay for the required Technical and Non-Technical services and infrastructure required to support this proposal. In addition, KCC questioned the of the of assessment of Greenfield and Green Belt and the lack of review. Section 6.12 and 6.13 state a number of implications, such as urban sprawl and reduction of boundary containment and an approach that should consider urban sites firstly. We are not clear that this guidance and considerations have been taken into account, as there is little detail on where the urban and brownfield sites have been agreed, the number of houses planned and the calculation methods used on these sites. Also, the majority of the proposals put forward by Gravesham Borough Council contribute to reduced boundary strength and containment. Can Gravesham Borough Council safely and clearly state that they have performed a detail and thorough review without bias and also provide transparency on the approach used on urban and brownfield sites.

- **Calculation of the need** – The ONS has stated a very different number for population growth, so we would like to understand where and how GBC calculated the numbers and need highlighted in this consultation. There has been no transparency of detail on this mechanism.

Observations

Whilst the consultation documents may have explored various aspects of the impact and presented these, we believe it showed a bias to the preferred GBC outcome and it did not fully represent all aspects, this was through generic terminology and exclusion in part of whole of some factors.

Observations

- Rural broadband has seen some improvements, however these come at an increased cost to residents resulting in low take-up. Can the current broadband services cope with the increase in demand especially with more peoples reliance on the technical infrastructure?
- The average GP/Patient Ratio in England (July 2019) was 2,087/GP. Meopham Medical Centre has 9812 registered patients (March 2020) with 4 GPs (ratio of 2,453/GP). Borough Green Medical Centre has 14,825 registered patients with 7GPs (ratio of 2,117/GP) Downs Way Medical Centre Istead has 16,528 registered patients with 4 GPs (ratio of 4,132/GP).
- Long hospital waiting lists and staff shortages at the hospital were already a concern for local residents before Covid-19.
- Local lighting – CPC is a low light pollution area, this could be eroded by additional developments
- Sewage capacity is stretched – before sites are allocated it should be established that there is the foul water capacity to service it.
- Schools in Gravesham are generally oversubscribed, with a number being offered places at Ebbsfleet Academy in Dartford.
- The failure to take into account the Lower Thames Crossing (LTC) or the proposed London Resort theme park is an oversight – the A227 and A226 are expected to see a big increase in traffic from the LTC, which will have an adverse impact on highway safety at the Tollage interchange – which is particularly hazardous – especially for non-motorised users (NMU).

- Population increases runs counter to the Council declaring a climate emergency. Excessive development will increase carbon emissions. More weight should be given to the impact of development on levels of air pollution.
- Rural areas suffer from having a limited bus service. CPC pay for an additional service on Thursdays and local bus routes are routinely cancelled or delayed. This restricts employment opportunities and the daily lives of those who have mobility issues or don't own a car. In addition, routes used by the bus operators are not direct, and very protracted, causing further delays. Routes using the A227 are longer than many, making them vulnerable to delays and cancellations. School children have to sometimes travel hours in a day, rising early and returning late, which detracts from their quality of life and affect Mental Health.
- There are no safe Non-Motor User routes between the rural communities, with many areas not having sufficient walkways, which given the poor bus service makes them car dependant. Roads linking the rural settlements could not cope with the increase in traffic from the proposed development, which also seem to be at odds with the GBC environmental targets
- What provision is being made for waste disposal in the area, which is already being targeted by increased level of illegal fly-tipping?
- Currently, we have an issue with reported crime and the ability of the community officers to appropriately police the areas, what considerations have been made or discussed with the police for the increased dwellings?
- Current Traffic is already causing issues to infrastructure, with the 'sink-holes' in Halfpence lane causing both water supply and traffic issues.
- Cost of any work will be an issue with dependencies on KCC and other organisations to help pay for this work, especially for technical and non-technical infrastructure and utilities.
- Sewage capacity is stretched - before sites are allocated it should be established that there is the foul water capacity to service it.

Duty to Cooperate

No evidence or reference that GBC complied fully with a duty to co-operate with other planning authorities. In particular, concerning the development of the site of the former Northfleet Cement works (EDC/16/0004 on your Brownfield register). This site (at 31.4Ha) should have been built out to provide 1,256 homes for Gravesham, but has only planning for 532 homes under EDC – a shortfall of 724 homes. What steps under the duty to cooperate have GBC taken to ensure EDC take responsibility for this shortfall? Although not a direct impact to our Parish, it denotes a standard approach or behaviour that could be applied.

Traffic

Cobham Parish is already facing challenges with current volume and traffic activity. The CPC are currently working with Kent County Council on addressing some of the issues raised. The increase in planning would only add to the current traffic concerns as both Sole Street and Cobham would see increases in traffic, through the use of our villages as a bypass between the A227 from these proposed developments and the additional load from the proposed Lower Thames Crossing. The below, current issues would be magnified:

- Safety of pedestrians and property owners along the narrow areas of The Street, Cobham, where vehicles mounting the kerb and driving partly on the footway is a common occurrence
- Lack of appropriate signage across the area, informing drivers of the current vehicle restrictions/limitations resulting in use inappropriate vehicles accessing the villages as a 'short-cut'
- Safety of NMU as they negotiate from Cobham to Meopham, where we have a lack of cycle lanes and pavements
- Additional volumes of traffic from the proposed Lower Thames Crossing and development of London Resort across the area
- There is an accord that the Cobham/Sole Street to Meopham corridor (A227 to A2/M2) is being used inappropriately as a rat run route, primarily by A2 users. This would increase traffic from A227 where a large number of developments are planned.
- Given that the source of the traffic problem is primarily displaced traffic coming off the M2/A2, in order to avoid congestion and delays, KCC are working with both Highways England (HE) and Lower Thames Crossing (LTC) to collaborate on a future scheme that keeps such traffic where it should remain, on the Strategic Road Network owned by HE, however this traffic will likely be replaced by that on the A227. This is further compounded by the fact that KCC view the A227 as a main artery on its road network, thus will have no weight limit. This could result in heavy good vehicles and larger commercial vehicles using the villages as a cut-through. This in turn, will place additional stress on our own village infrastructure, where we have narrow single lane roads and weight restriction on bridges.
- Increased pollution and noise impact of increased vehicle numbers, due to poor local transport and services.
- Current volumes and weight of traffics impact on roads is already evident, with a several 'sink-holes' forming in Halfpence Lane – leading to water and traffic issues.
- We have an SID that has been tracking volume and speed of traffic pre and during COVID-19. Our village roads currently carry five times the national average, with Peak times show 1400 cars an hour through our villages, even during COVID lockdown this was still as high as 800. The Parish is known for safety issues and congestion at peak times.

Questionnaire

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?

Primarily, the current services and infrastructure we have is known to be lacking, we already have an overstretched GLP and NHS services, these need to be increased, along with better facilities for NMU and accessibility through improved technical infrastructure. Therefore, we feel the current infrastructure and services are at the point of being unable to cope with current growth, let alone with a large increase in population without ring-fenced and ongoing investment in rural communities, covering all these aspects. In addition, there needs to be a respect of rural and village life and the services need to balance out the needs of rural people to a level of services in line with those of towns and bigger settlements. The CPRE paper "CPRE Greener-Better-Faster July 2020" outlines some of these provisions. <https://www.cpre.org.uk/wp-content/uploads/2020/07/Greener-Better-Faster-July-2020.pdf>

In addition, we feel that all the above raised issues should be considered:

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- Current volumes and weight of traffics impact on roads is already evident, with a several 'sink-holes' forming in Halfpence Lane – leading to water and traffic issues.
- We have an SID that has been tracking volume and speed of traffic pre and during COVID-19. Our village roads currently carry five times the national average, with Peak times show 1400 cars an hour through our villages, even during COVID lockdown this was still as high as 800. The Parish is known for safety issues and congestion at peak times.

Q2: Do you agree with retaining the current Local Plan Core Strategy Vision? (Please explain your answer by providing additional detail where possible):

NO

We do agree there needs to be a Local Plan Core Strategy Vision and that there are elements of the current one that make sense. Ultimately, the Local Plan Core Strategy Vision needs to focus development on non-greenbelt and ensure these are utilised effectively to deliver the dwellings and services required across the region, planning needs to play a crucial part in upholding commitments to plans and not resorting to reduced capacity, lower affordable housing in developments and reduced or no improvement to services.

The current plan looks to build out on Green Belt eroding boundary strength and containment across rural villages. This in turn will have a material impact on the ability for natural environments to absorb carbon, as we build on these areas not only do we take away that capability, but the plan adds to the problem. In addition, the plan does little to support or suggest improvements to support local economies outside of Gravesend Town Centre, which should be a core value. True a number of businesses will benefit short-term, but these are huge companies that contribute little to our own economy past that short stage – we are mortgaging our future.

Q3: 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)

Yes – however, it would have been helpful if the 18 objectives had been re-stated – as per the vision.

Q4: 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)

COVID-19 has magnified the importance to Mental Health and Physical Wellbeing we have seen a marked increase in people utilising the footpaths, natural and open spaces. These areas give them places to safely meet, exercise and relax outside of the built-up areas – a place of escape and calm. The proposed Lower Thames Crossing and the areas identified within this plan will erode these opportunities. The focus should be given to providing sufficient rural and open space, ensuring these are maintained and not hemmed in by developments.

Improving traffic management across the villages is already in progress but has only a short-term plan. There needs to be a longer-term plan, that takes into account not just the current London theme park and proposed Lower Thames Crossing, but the impact of any of the proposed items within this consultation, which it clearly does not show.

Improved cycling lanes and pedestrian paths across the areas to support both recreational and travel to work/shops. Currently there is no footpath or cycle lane that exists that can be used to get from Cobham through Sole Street to Meopham.

Providing and safeguarding the ‘countryside next door’ is essential for our wellbeing.

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

Q6: If your answer is no, please set out why you think this and what different methodology should be used and why?

We agree with CPRE Kent on this issue

Q7: 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?

<<No Response>>

Q8: Should the Borough Council require developers to specifically meet the needs of specific groups such as the elderly?

YES

Any and all development needs to ensure they meet the needs of the community and all the groups within that community. The appropriate facilities, services and technical infrastructure needs to be embedded within the developments, rather than focus on just the houses. This may mean that additional work would be done outside of development areas to support this (e.g. increase/replace waste and sewerage, building of cycle routes and pavements).

Q9: Would you like to see more first homes and homes for older people built across the whole of the Borough?

<<No Response>>

Q10: 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?

<<No Response>>

Q11: Should the existing approach to density standards in the Borough be changed? If it should, what alternative approaches should be considered?

Cobham Parish supports higher densities, where it makes most sense, it is most appropriate and there is the network of services to support it, as this helps reduce the need for greater land take. Policy CS15: Housing Density at 5.11.5 reads 'Sites will be developed at a variety of densities, depending on their location and accessibility to public transport.' This should be amended to include reference to active travel and also public transport that has the appropriate support network.

Q12: Should higher density development be sought in close proximity to rural train stations (i.e. Higham, Meopham and Sole Street)?

No

As per question 11, whilst it is appropriate to seek higher densities, they should be provided at locations that not only have good public transport, but also appropriate support networks. That is, have sufficient bus and other transport options to support the rural train stations. Currently, at Sole Street, there is a very limited and protracted bus service, that would increase the time it takes an individual to travel from that area, thus impacting on mental health and quality of life. There are no supermarkets, medical facilities, libraries or schools within walking distance of Sole Street Station, thus it is likely that we would see an increase in motorised traffic which would only increase the impact and traffic problems we currently have. This would also lead to decreased air quality and go against GBCs environmental commitments.

Q13: 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?

We agree with CPRE Kent on this issue.

“Covid19 has reminded us how important essential service workers are to our health and happiness. There is a need for more dedicated keyworker housing. These workers can be priced out of rural areas, undermining the resilience of countryside communities. Rural affordable housing needs to be protected in perpetuity. The Government’s First Homes initiative is a way of providing lower cost homes in the countryside. More dedicated keyworker housing should be provided, together with investment in rural social housing that is retained in perpetuity.”

Q14: Should the Core Strategy thresholds for the provision of affordable housing be changed? What evidence do you have to support your view?

We agree with CPRE Kent on this issue (as per question 13)

Q15: Should the Borough Council apply the existing affordable housing requirements to Built to Rent schemes?

We agree with CPRE Kent on this issue (as per question 13)

Q16: 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?

We agree with CPRE Kent on this issue (as per question 13)

Q17a: 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?

Gravesham Borough Council/Kent County Council have already created a strategic plan and have identified the sites within this plan.

Cobham Parish is already in the process of responding to a number of small sites and their impact on the rural area. We have an injunction on land marked as Green Belt

Q17b: Do you agree with the methodology utilised for the recent GTAA and the household need identified? If you do not, please provide alternative evidence.

Unfortunately, the document is not accessible via the GBC website as a login is required to access the document. Therefore, a review of the methodology used cannot be assessed.

[https://localplan.gravesham.gov.uk/gf2.ti/f/1210690/83753829.1/PDF/-/Gravesham GTAA Final Report.pdf](https://localplan.gravesham.gov.uk/gf2.ti/f/1210690/83753829.1/PDF/-/Gravesham%20GTAA%20Final%20Report.pdf)

The request would be to extend the consultation period further to allow the appropriate access and review of the documentation that this consultation is asking us to provide an opinion on.

Q17c: 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?

Currently, we have a number of examples of unknown and requests for planning. On these sites are a number of planning infringements that we have asked Gravesham Planning to investigate. GBC Planning need to be more responsive to rural needs and enforce appropriately.

Q18: Should we continue the current approach to protecting existing employment areas? If not, what evidence do you have to support your view?

We agree with CPRE Kent on this issue.

Q19: 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?

With Covid-19 fallout there will be, unfortunately, a large amount of available retail and office space available in the town centre, along with space in our retail parks, due to businesses closing, unable to survive through COVID. In addition, a large number of companies are reducing their commercial and office footprints to move employees to home working. GBC's focus should be on attracting investment by improving the current areas and facilities and increasing usage of these spaces, rather than looking to build out further, utilising the current plans to provide areas of investment that support the already planned London Resort and Ebbsfleet Garden City. This in turn will create both investment and employment opportunities.

Q20: What provisions should be made to promote micro and small businesses in the Borough and to encourage people to work from home?

COVID-19 has accelerated business thinking and promote, where possible working from home. A large number of businesses are reducing their commercial and office footprint to support this move to home working. Considerations should be made to encourage further investment in technical infrastructure, to support homeworking and also the conversion of existing single use buildings and businesses to multi use – allowing smaller businesses a foot hold by reducing overheads by having a work-home office and also encouraging small retail businesses into our high streets.

In addition, a number of the current vacant buildings could be turned into Business Hubs to attract small businesses and again reducing overheads.

Q21: 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?

In principle yes but we would need to see much more detail on how it is proposed that this would be achieved before commenting further.

Q22: What measures should be undertaken to reduce levels of out commuting?

YES

In essence, due to COVID, this is already happening and for a lot of businesses will continue. The provision of better facilities (e.g. Business Hubs) and technical infrastructure (e.g. Fibre Broadband, 5G coverage) will encourage more to work at home and reduce levels of commuting. This in turn, will result in more local investment.

Attracting firms to our vacant retail spaces would also reduce commuting, as our high street and retail areas have been hard hit, we need to ensure a regeneration plan is in place to attract and maintain businesses to this area.

Creating large developments on Green Belt will not reduce commuting, if anything it will have a counter effect, as individuals have the ability to live further outside London but commute in.

Q23: 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

Gravesham and the other existing areas already underway or in place, namely: Springhead, Northfleet Riverside and Wrotham. Habits are changing and people are now shopping locally, how long this will last is unknown, but is primarily due to COVID. Cobham Parish is setup to provide the relevant retail, leisure and recreational facilities through its local shops, pubs, clubs and rural/open spaces. The current proposals will erode this.

Q24: 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?

<<No Response>>

Q25: Is the Borough Council's revised settlement hierarchy approach suitable? Please provide details.

No

We support CPRE Kent on their commentary. Ultimately the revised settlement hierarchy approach seems to be unbalanced and does not give enough detail into how these were formed. Hook Green would have a material impact on Cobham Parish, but it is seen as a large village, being grouped with Meopham. By inference building out on Hook Green within the new settlement hierarchy will materially impact the boundary strength and erode that boundary significantly to the point where there is not material break between the villages. The impact of the housing allocation provided by this approach and the proposed use of parcel HG3/GBS-E to build out 520 dwelling, would more than double Sole Streets 406 dwelling number.

GBC needs to rethink this settlement hierarchy in totally, rather than grouping individual settlements together, they need to take each on its own. We would also ask GBC to share the methodology used to align each of the settlements to the revised levels.

Q26: 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 agree with CPRE Kent on this issue.

Q27: 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?

We have some concerns with this statement as it is unclear how the housing requirement would be broken down and may result in material impact to our villages/Parish. If you are breaking down housing need, should you not also break out the supporting services and infrastructure needs required? Most Parishes are in Green Belt, and we feel this may be an alternative method or opportunity develop on Green Belt land.

Q28: 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?

None of the above

Cobham Parish Council do not agree with any of the approaches. We would consider alternative approaches – but disagree with all of the proposed areas for development that are either on Green Belt and farmland with Cobham Parish and the surrounds (e.g. Meopham, Hook Green etc.).

Q29: Do you support the formation of Neighbourhood plans, should the council encourage their establishment by local communities?

Yes

Cobham Parish Council will be working to update the existing Neighbourhood Plan based on the latest activities and information. These should be taken into consideration

Q30: Do you agree with these criteria?

No

Across a number of historic and existing consultation papers a number of criteria and approaches have been written (e.g. KCC response to GBC 2011 consultation). What is unclear is how GBC and the consultation has arrived at the decisions and approaches it has proposed, how allocations have been made and the fact there is clearly more clarity required on calculations and their outcomes.

The Stage 2 Green Belt Study acknowledges this issue at paragraph 13 where it states: “planning judgement is therefore required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In light of this, this assessment of harm to the Green Belt purposes does not draw conclusions as to where land should be released to accommodate new development ...”

To date, no clear evidence has been provided as to how these planning judgements have been made. In addition, although time is taken to explain the use of Green Belt and its purpose and we have a clear explanation of that, the conclusion within the document appear to contradict these. In summary, the proposals are aimed at all areas of high impact within our Parish and also are based on the fact that because other areas in the country have done this, we should. Just because other areas circumstances have resulted in an erosion of their Green Belt, should that really be one of the underlying reasons for this proposal?

As per earlier commentary the Duty of Cooperation appears to be unclear, with no conclusions as to what discussions have been had or avenues explored to see if other areas (section 1.9.10 refers to Sevenoaks, Medway and Dartford) can assist with our need. We would also be interested to know why other areas such as Maidstone & Tonbridge & Malling have not been included in these vital discussions. In addition, it is unclear how conclusions have been made related to what can or cannot be met within existing urban areas or inset settlements.

All our other points have been covered by CPRE Kent and we agree with their observations on this issue.

Q31: Should the Council continue with the Local Plan Core Strategy’s existing approach of ensuring existing settlements do not merge?

Yes

For reasons of social cohesion and reducing the impact on the openness of the Green Belt.

Q32: Do you have any views in relation to the sites identified in meeting the Borough’s needs so far?

The consultation is confusing. It states that the standard methodology for calculating house need requires 10,480 homes over the period from 2020-2036 (paragraph 1.6.8). However, there is no data on existing housing land availability – allocations that have not been started, planning permissions that are not started or under construction. It is therefore unclear what the residual need is when windfall sites are taken into consideration.

Cobham & Sole Street, along with parts of Hook Green and Meopham did not for part of the existing KCC response as identified areas to the GBC in 2011, so we are unclear why they would be required now.

Cobham Parish Council disagree with all of the proposed areas for development that are either on Green Belt and farmland with Cobham Parish and the surrounds (e.g. Sole Street, Cobham, Meopham, Hook Green etc.). Each of these sites will have a detrimental material impact on either boundaries, open spaces, traffic, services and mental health as illustrated throughout this response. In addition, there is very little evidence of the methods used to ascertain the how certain sites have been selected and what housing need can be met by existing urban and brown field sites. In addition to opposing all, the study does not take into account other detrimental factors:

- C02 – Although moderate impact to Green Belt, releasing this parcel of land would have significant impact to rural and village life. This current area provides a break between open spaces and settlement as well as providing key community services through the use of the Meadow Room which supports charities, clubs and societies both within the village and across the borough and beyond.
- C03 – Although low moderate impact to Green Belt, releasing this parcel of land would have significant impact to rural and village life. This current area provides sports and leisure facilities for many local clubs and societies, facilities for many local clubs and societies, not just with our Parish but for other villages too.
- C07 - Although moderate impact to Green Belt, releasing this parcel of land would have significant impact to rural and village life. It is a place of special interest, with the old college remains located on the site – this site dates back to 1362 and could be seen as a place of significant historical and architectural significance
- SS2 – Although moderate impact to Green Belt, releasing this parcel of land would have significant rural impact. Over the years this site has had multiple planning applications all turned down for various reasons, including the fact this is Green Belt land. This would further erode the boundary between settlements and green belt.
- HG3/GBS-E – This would materially impact the boundary erosion between settlements and potentially create a single bigger village from Meopham through Hook Green to Sole Street. This would more than double the size of Sole Street as it is today, without additional services or infrastructure.

The Green Belt analysis document “Gravesham Greenbelt Report Appendix A Final” that highlights the proposed areas, shows bias based on items within the consultation as already being approved – namely Stage 1 of the consultation and Option 4 coupled with the not yet agreed new settlement tiering. With both these taken away, this report would read very differently. The CPC agrees and supports the statements made in relation to other proposed sites as impactful to the erosion of the Green Belt and contributing to lower boundary strength.

This appears to be a hurried consultation at a time where most people's focus is on ensuring are not impacted by COVID. As per previous commentary, the feeling is that the current situation may be being exploited in part as people are unable to review and or meet to discuss the materials and proposal of this consultation.

We agree with CPRE Kent on this issue.

Q33: Are there any alternative approaches that the Council should consider?

Gravesham Borough Council has not worked with or, to our knowledge, involved Cobham Parish Council on any of the above consultation or has asked for and Neighbourhood Plans or input from the council. There are always other options and we would welcome GBC working in partnership to find a balance. Therefore, currently do not support any of the options or identified parcels suitable for further development for all the reasons previously listed.

This study, in no way takes into account changes as a result of Covid 19, which will result in an increase in available office, retail and retail park space becoming available, that could be reused to meet more of the need and also provided as dual usage to encourage investment within the borough.

We have already mentioned the mental health and ecological impact that these proposal will have on the community. Putting Health in Place (2019) [<https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-executive-summary.pdf> and <https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-2-design-deliver-manage.pdf>] concludes that new places should create the conditions for social and economic connections to take root and grow, and that these connections are more likely to be successful when places are compact, walkable and mixed-use and have a distinct identity. The current plans look to grow and erode these community boundaries.

In addition, it is not clear if GBC has taken into account wither advice and guidance from KCC or the CPRE on its approach to meeting housing needs and would request the GBC look at these options, coupled with the changes to our community and borough through the COVID 19 situation, before looking to release important parts of our rural estates and countryside.

Q34: Should the Council be more specific in relation to defining the Open Spaces that are protected and be more specific regarding future provision?

Yes

COVID-19 has magnified the importance to Mental Health and Physical Wellbeing we have seen a marked increase in people utilising the footpaths, natural and open spaces. These areas give them places to safely meet, exercise and relax outside of the built-up areas – a place of escape and calm. Any development across the Borough should look to ensure that Open Spaces are maintained and not eroded through poor planning and limited consultation.

Q35: Should the Council designate local green spaces? Do you agree with the local green space criteria identified?

CPC supports the designation of local green spaces.

Q36: Are there any additional sites that should be considered for local green space designation through the plan making process? If yes, please see use the Local Green Space nomination form to nominate a site.

Yes there are potentially, additional sites.

These will be submitted as part of the Cobham Parish Council Neighbourhood Plans

Q37: What particular pressures do you experience in relation to existing infrastructure, please provide details such as type of infrastructure and location?

Medical Facilities

- The average GP/Patient Ratio in England (July 2019) was 2,087/GP. Meopham Medical Centre has 9812 registered patients (March 2020) with 4 GPs (ratio of 2,453/GP). Borough Green Medical Centre has 14,825 registered patients with 7GPs (ratio of 2,117/GP) Downs Way Medical Centre Istead has 16,528 registered patients with 4 GPs (ratio of 4,132/ GP).
- Long hospital waiting lists and staff shortages at the hospital were already a concern for local residents before Covid-19.

Education:

- Schools in Gravesham are generally oversubscribed, with a number being offered places at Ebbsfleet Academy in Dartford.
- The Parish Pre and Primary schools are always heavily oversubscribed, with local children having to travel for the same facilities.

Sustainable Transport

- The rural areas are car dependent as the sustainable transport network is poor and there are no safe active travel links between the rural communities. Rural areas suffer from having a limited bus service. Cancelled or delayed buses restricts employment opportunities and the daily lives of those who have mobility issues or don't own a car. In addition, routes used by the bus operators are not direct, and very protracted, causing further delays. Routes using the A227 are longer than many, making them vulnerable to delays and cancellation and delays. School children have to sometimes travel hours in a day, rising early and returning late, which detracts from their quality of life and affect Mental Health.
- There are no safe Non-Motor User routes between the rural communities, with many areas not having sufficient walkways, which given the poor bus service makes them car dependant. Roads linking the rural settlements could not cope with the increase in traffic from the proposed development, which also seem to be at odds with the GBC environmental targets
- Currently, we have an issue with reported crime and the ability of the community officers to appropriately police the areas
- Current Traffic is already causing issues to infrastructure, with the 'sink-holes' in Halfpence lane causing both water supply and traffic issues.

Appropriate Investment

- Cost of any work will be an issue with dependencies on KCC and other organisations to help pay for this work, especially for technical and non-technical infrastructure and utilities – these organisations are already having to prioritise and limit what they can do for existing rural objectives.

Waste & Water

- What provision is being made for waste disposal in the area, which is already being targeted by increased level of illegal fly-tipping.
- Sewage capacity is stretched - before sites are allocated it should be established that there is the foul water capacity to service it.

Q38: 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?

No

It is widely understood that the procurement and supply chain management of government bodies is prone to mishandling, as recent examples have shown with the PPE preparations and COVID-19. It is also unlikely, that GBC can commit to commercial benefits, therefore attracting appropriate commercial entities in providing the level of services, utilities and technical infrastructure without heavy subsidies and further County and Government support, both of which post COVID will be unlikely to materialise. Even pre-COVID, KCC had raised the questions in the response to GBC 2011 consultation, regarding GBCs assumptions and expectations on how KCC would fund to meet and support the consultation plan.

GBC should commit to ensure appropriate contractual and measurable deliveries if it assumes that the commercial partners and providers will be involved. None of this has been promised within the consultation.

Q39: Do you agree that the Council should be addressing the Climate Change emergency proactively?

Yes

The government has committed to eradicating net climate change by 2050. The review Plan's allocations and policies will need to be prepared with this in mind, at this stage they are not and run counter intuitive to this goal. There is a need for a locational strategy for new development that supports and promotes active travel and public transport as well as reduce the impact on Parishes by allowing them to support and help offset the impact of climate change.

The countryside can assist in aiding climate change and the Green Belt, woodlands and open spaces all contribute to helping to offset our carbon emissions. Should this be reduced and built on, it is creating a two-fold affect and impact:

- 1) Reducing the ability of these spaces to offset carbon by reducing their footprint
- 2) Increasing the carbon emissions through dwellings and increased car usage, produce by a poorly thought-out plan to meet housing need.

Q40a: Should the Council make provision for large-scale renewable energy generation

Cobham Parish supports renewable energy generation, but this activity needs to be in keeping with the surrounding landscapes and sympathetic to the surrounds.

Q40b: The Borough has recognised wind resource, would you welcome wind turbines?

Cobham Parish supports renewable energy generation, but this activity needs to be in keeping with the surrounding landscapes and sympathetic to the surrounds.

It should also be recognised that Cobham Parish is close to a substation and therefore has a number of large pylons across the estate, installing wind turbines would not, we feel, be a welcome addition and would further detract on the rural feel of the village, cause noise pollution and endanger wildlife.

Q41: 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.

CPC, aligns its thinking with CPRE Kent, with an approach that:

- Improves energy efficiency for new homes to reduce demand for new energy supplies, lowering electricity bills and lifting residents out of fuel poverty.
- Encourages solar panels. Given government aim to phase out petrol and diesel vehicles and move towards electric cars solar panels on homes would help support the National Grid. The present guidance means that homes can be deemed energy efficient without the need for solar panels.
- Promotes new homes that are designed with electric car charging points either installed prior to sale or with a layout that enables easy retrospective installation by occupiers.
- Supports and encourages fast charging electric vehicle chargers in new development, both residential and commercial.
- Encourages new development to be carbon neutral and have the highest energy efficiency standards.

Q42: Should strategic development allocations be required to make use of decentralised heating and cooling networks?

<<No Response>>

Q43: 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?

Yes

All developments should go further and be not just neutral but look to offset some of the damage from any such developments

Q44: 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?

The creation, protection and enhancement of green spaces are crucial for tackling the climate change emergency and for providing the 'countryside next door' that is essential for our wellbeing.

- There is a need to maximise the landscapes' ability to capture carbon through natural processes. This should be done in ways that compliment and enhance their unique character respect nature and support sustainable local economies. (<https://www.cpre.org.uk/wp-content/uploads/2020/07/Greener- Better-Faster-July-2020.pdf>)
- Promote the creation of a Nature Recovery Network to:
 - increase the capacity of the natural environment to absorb carbon
 - mitigate the effects of more extreme and volatile weather patterns
 - create a network of habitats and green/wildlife corridors that will enable wildlife to migrate as needed in response to a warming climate. See <https://www.wildlifetrusts.org/nature-recovery-network>

Q45: Should the Council seek to deliver net zero carbon development at a faster rate than allowed for by Government Building Regulations?

Yes