

Luddesdown Parish Council

25 Spring Cross, New Ash Green, Longfield, Kent DA3 8QG

Tel: 01474 879347 mobile: 0780 263 4971

Email: clerk@luddesdown-pc.gov.uk

30 December 2020

Cllr John Burden
The Leader of the Council
Gravesham Borough Council



By Email.

Re:Local Plan Core Strategy Partial Review and Site Allocations Regulation 18 Stage 2 consultation:

In response to the latest consultation by Gravesham Borough Council (the Council) on the core plan Luddesdown Parish Council (the PC) would like to make their opinions known.

We respect the very large amount of work this plan reflects and commend the Council in its efforts both to produce a coherent plan for the community as well as to engage us in its delivery. The government questioned the need for local planning in August, but the PC take seriously the findings of the National Audit Office report on the effectiveness of the planning system which shows that; Town Planning is working effectively however the Planning Inspectorate is failing under the load imposed by changing requirements. It is our intention to support the need for a local planning authority, over the proposed centralisation of this function. However there are aspects of the proposals we find troubling and feel the manner in which the Council has sought to engage with the community in this instance has been flawed.

We are sympathetic to the predicament of the Council in seeking to deliver a long term plan in a rapidly shifting legislative environment driven both by changing demography, environments and policy. We note that during the course of the consultation the Minister for Housing, Communities and Local Government made two written statements which radically affect the legislative environment. It is nearly impossible at this rate of change to create a plan that will be deliverable in the required timescale with any degree of future-proofing.

Given the uncertain nature of the legal framework into which this plan must fit and the strong response to consultations against the proposal to remove land from the greenbelt, we expect the Council produce a plan for the community that lives in Gravesham now – and not for the transitory targets set by others. The PC regard the figure of 6,480 as a more accurate estimate of actual housing need by 2036 and one which reflects the constraints faced by Gravesham, and the proven reduced demand for housing in this borough together with recognising the new importance of greenspace. Provision of excess 'land supply' will result in land banking and not excess housing provision as we are all aware.

The protection of the greenbelt

As a rural parish, we feel that the greenbelt has been considered only as a resource for future development within the proposals and that comparatively little weight has been given to the need to protect and conserve the greenbelt. There is also no consideration of the permitted developments that would necessarily follow in the wake of the proposals made in this consultation such as schools, medical facilities, solar parks and golf courses – which will be accommodated within the greenbelt if the proposals go ahead.

Lack of commitment to green transportation

We reacted strongly your inclusion of question 12 (proximity of new developments to local railway stations) within your consultation, as this appeared to us to be a clear bias towards creating housing for new commuters.

It is possible that your actual intention was to promote public transport and create a greener environment, but in the absence of a green transport policy and as there is no public transport in Luddesdown we felt this question was indicative of an inappropriate mind set. If the Council were to create a policy and promote green transportation, the PC would be supportive.

Duty to Cooperate

There is a shortfall of 714 homes on the site of the Old Northfleet Cement Factory being developed by EDC. EDC clearly have a duty to take responsibility for these homes from our plan, and the Council has a responsibility to ensure they do. Unless the plan reflects this; your duty will be un-fulfilled.

The consultation

Running the consultation at this time has denied residents access to the written materials and councillors the ability to engage with our electorate in discussing the single most important plan for our communities. We have been approached by residents who have been unable to access the materials online, but the response received from most when challenged is that they simply were not aware of it taking place, or had no idea of its importance.

The amount of material needed to be downloaded and read online presented a significant challenge to those who are aged or with little or no broadband or technical facilities. The critical aspect of this consultation was whether residents could access and rely on the consultation documents online. Against this the Council actually changed the consultation documentation and removed documents during the consultation without notice to those who had responded or downloaded the documents. Under these circumstances the Council had a clear duty to restart the consultation and notify residents of the changes they had made in writing. In particular the change to Question 25 of the primary consultation document was completely miss-leading, changing the table 18 title from number of houses proposed to percentage of housing proposed.

The manner in which the documents were posted then removed from the Council's website makes it clear that there has been inadequate change controls over the documentation (in that there was no notification to the consultee of changes). As a result consultation responses received cannot be linked unambiguously to proposal made prior to the start of the consultation; the results of this consultation are therefore void. The timing of this consultation (in the run up to Christmas) would in a normal year be inappropriate, in this year it was ridiculous. The matter therefore was not capable of sufficient consideration.

Thank you for taking time to consider our comments as we are aware how tedious reading lengthy documents online can become, but we trust you will address these matters prior to the next consultation.

Yours Sincerely



Noel Clark

(Chair to Luddesdown Parish Council)

email: noel.clark@luddesdown-pc.gov.uk

Cc: Borough Councillors: Cllr Rice, Cllr Lane