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

The existing transport infrastructure is due to be placed under intolerable strain by the proposed development of the LTC and London Theme Park. Luddesdown currently experiences very high loads of through traffic on it's single track road network due to excess traffic on the A2 A227 and A228. Further developments at Higham and Sole Street (Meopham Camver Road) and along the A227 will lead to grid lock on the access roads to the village for large parts of the day denying access to emergency vehicles and residents. The increases in traffic on narrow lanes which have no footpaths creates greater danger for NMUs. The parish's lanes are also used by a large number of visitors who come to see the AONB.

Persistent fly tipping and rural crime is also a serious issue for residents.

The infrastructure we would like therefore is a 'no access' and 'no through route' restriction at all main junctions to the lanes supported by a network of enforcement cameras to reduce the average speed of all traffic on all rural lanes to 20mph and to capture the registration numbers of all vehicles entering them (for enforcement purposes both to deter through traffic and detect fly tippers and criminal activity).

At the present time Luddesdown is poorly supported within the borough for secondary schools and GP facilities, causing many residents to seek these services outside the borough.

We would also like to note that the practice of pouring effluent slurry on local fields has increased in recent years. While this practice has agricultural benefits, as residents we resent the increase which is being driven by increased load on sewage plants and would recommend improved planning for sewage treatment for all new developments. The Council should keep in mind all the effects of planned expansion on our parish.

# **Question 2**

Do you agre	ee with retaining the current Local Plan Core Strategy Vision?
Yes ⊠	No $\square$
(Please exp	lain your answer by providing additional detail where possible)

In your narrative you refer to Ebbsfleet Garden City as if the project is some sort of housing success story; when in reality it has been a disaster taking 18 years to deliver the first 2,000 houses. 14,000 were planned 18 years ago on land that has been dedicated for that purpose. We feel a more representative view of the failures that have lead to the 16 year delay in delivering any houses at all at the Ebbsfleet should be borne in mind when proposing to dedicate land to housing supply for the next 16 years.

#### **Question 3**

Do you agree with retaining the current Local Plan Core Strategy Strategic Objectives with minor amendments?

	_		
Yes	IXI	No	

(Please explain your answer by providing additional detail where possible)

While agreeing with the 'direction of travel' argument; we think the current proposals do not take into account current government policy, particularly in regard to town centre regeneration:

"COVID-19 presents great opportunities for the repurposing of offices and retail. We need to seize that moment and ensure that we get more housing in our town centres. That is the way that we will drive footfall, and we will turn empty shops into thriving homes. We have already put in place new planning reforms to enable people to do just that, as well as to demolish vacant buildings and turn them into housing, and we will continue to find new flexibilities in the months and years ahead to do just that." Housing Secretary Rt Hon Robert Jenrick, answering Oral Questions, 16 November 2020.

### **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)

We are all concerned about the future for the retailers in our town centers (whom we do not want to lose). But the trends are for more and larger supermarkets on the outskirts carrying ever increasing ranges of services and product lines (driven out by town centre prices?) combined with decreasing footfall in specialist shops in the center.

The PC however feel at a loss to recommend solutions due to our own reliance on out of town suppliers and online shopping. It remains to be seen if the high street will survive the pandemic, since it is not just the retailers who face insolvency. Dramatically decreased returns on town centre sites will presage an increased flight in capital from commercial properties, leading to a price crash and potential black hole in Council budgets as business rate income disappears.

## **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?

Yes	No	X

It is the PCs view that the Standard Formula was incorrect, a fact borne out by the decreased population predictions produced by ONS and the governments own proposals to enhance the formula (proposed on 6<sup>th</sup> August 2020) which reduced the annual housing delivery figure from 655 to 405.

It is clear that if GBC were to produce 655 houses per annum, over 30% would remain empty or go to owners currently not resident in Gravesham. In reality the economics of housing supply (developer lead delivery) dictates these houses will not be delivered. The enormous damage to the greenbelt of your policy will therefore have no effect on housing supply.

Given the increased emphasis now placed on protecting the greenbelt and in providing

greenspace it is incumbent upon the Council to produce a plan that more accurately reflects actual (and deliverable) housing demand (i.e. 405 houses per annum) and one the consultees in this process actually support!

#### **Question 6**

If your answer for Question 5 is no, please set out why you think this and what different methodology should be used and why?

Using the governments own methodology but applied to the most recent ONS figures on demand and affordability (i.e. 405 houses per annum as proposed in the new algorithm 6<sup>th</sup> August).

Government policy now recognises the need to place protection of the greenbelt above housing land supply (see Q33).

## **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?

Yes □□ No 🗵

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.

While we have no evidence, anecdotal local reports in this parish show a greater reliance on the housing market in Trosley West Malling and Sevenoaks, with less or no impact from Medway.

We recommend the Council review its criteria for the existing boundary.

# **Question 8**

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

Yes ⊠ No □□

If the answer is yes, how would this be achieved?

By making provision for assisted living accommodation within new developments (in the same way you make provision for affordable housing).

### **Question 9**

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

17	NT.	◡
Y es	No	LXI

If the answer is yes, how would this be achieved?

We are in favour of assisted home ownership, but the existing provision of social housing has a role in that. We are not in favour of developer lead solutions as these have proven to lead to unforseen costs (and unfair profits to developers). If the current social housing portfolio is inadequate to assist in this role, we recommend the Council review its policy on this and allocate more funds to social housing provision. We assume the majority need for first homes is in the urban area. The need for adapted accommodation is equally capable of being met by adaption of existing buildings as via new build. The modern 'granny annex' developments developed within PDR have successfully been used to give entrepreneurial new house buyers access to the market while combating loneliness, maintaining family unity and reducing the need for full time care.

### **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?

Yes, be prescriptive  $\boxtimes$  No, be flexible  $\square$ 

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?

We are a little confused by the question. It is our expectation that the Council specify what type, standard and market developments should achieve prior to permitting them.

### **Question 11**

Should the existing approach to density standards in the Borough be changed?

Yes □□ No 🗵

If it should, what alternative approaches should be considered?

Higher density of affordable and starter homes should be considered, where opportunity and market exist. However all housing needs to be of a high standard, and be capable of serving the community where denser housing styles are chosen. Having lived in hi-rise accommodation and since many young professionals prefer this style of living I see no contradiction in this. However; as we are all aware, some of the worst accommodation in the country is hi-rise. We think the emphasis on good design and appropriateness of provision can and should prevail.

# **Question 12**

Should higher density development be sought in close proximity to rural train stations (i.e. Higham, Meopham and Sole Street)?
Yes □□ No ⊠
(Please explain your answer by providing additional detail where possible)
Your question appears to pre-suppose that housing needs to be built for commuters. As a former commuter this question seems miss-framed; the local stations do not necessarily provide access to the places commuters need to get to. There needs to be stronger provision of public transport to all housing centres.
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?
Yes □□ No ⊠
What evidence do you have to support your view?
Affordable housing is very important, but there needs to be a recognition the current measures (section 106) are inadequate to ensure delivery, and a better system be put in place. Providing a fixed proportion of affordable housing in the rural environment seems an incorrect policy since those moving into affordable housing are likely to be at an economic disadvantage; how will such occupiers obtain access to services and facilities? We suggest affordable housing in the rural environment needs to be more targeted (e.g. for identifiable agricultural, essential or rural workers) rather than a fixed percentage.
Question 14
Should the Core Strategy thresholds for the provision of affordable housing be changed?
Yes □□ No ☒
What evidence do you have to support your view?
With the exception discussed in Q13.
Question 15
Should the Borough Council apply the existing affordable housing requirements to Built to Rent schemes?
Yes ⊠ No □□
(Please explain your answer by providing additional detail where possible)
We are assuming here that the criteria will be that the built houses attract an affordable rent? - How will that be monitored?

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?

Yes ⊠ No □□

(Please explain your answer by providing additional detail where possible)

It seems sensible to include smaller plots within the overall plan targets.

# **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?

While not wishing any group or ethnicity un-equal access to resources and opportunity; we are unable to represent the needs of travellers adequately due to the nature of their lifestyle and lack of interaction with them.

On behalf of our residents, we object to the random and completely dis-proportionate access travellers appear to have within the planning system. This appears to allow them effectively to 'homestead' developments within the green belt with no other justification than 'the local authority has been unable to offer alternative accommodation which accords with my chosen lifestyle'. We believe that all developments should fall under the same constraints notwithstanding the lack of availability of alternative accommodation.

This said; under the current regime the provision of hard standing and amenities need to be a priority for travelers. I note that within the draft SHLA there are sites reported as unsuitable for development; and wonder if any of those would be suitable for hard standing, particularly as many are adjacent to main thoroughfares.

#### **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.

Yes 🗵	No								
(Please	explain	your	answer by	y providing	additional	detail	where	possib	le)

### **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?

If they do not meet the definition; they should be dealt with in that light (i.e. as all the other 5000 people on the Council's waiting list).

### **Question 18**

Should we continue the current approach to protecting existing employment areas?				
Yes 🗆 🗆	No ⊠			
If not, what	evidence do vou have to support your view?			

The PC has no strong feelings on this, but it is our impression that employment patterns are changing, and our approach towards employment areas needs to change with it. There are a great deal more opportunities to work from home and to work collaboratively in shared office space or online. The advent of fully flexible manufacturing systems and fully automated fulfillment will likely mean a decrease in traditional factories, offices and industrial units. Traditional units will continue to serve existing / legacy industries with new startups tending to focus on multi use buildings or rented office space

## **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?

Yes □□ No 🗵

(Please explain your answer by providing additional detail where possible)

See above answer to Q 18. The majority of employment opportunities for new startups are unlikely to require further land. Larger employers moving into the area can look after themselves.

There are opportunities for seasonal work and land based careers that are not currently being met by the UK labour force. This is an area that needs to be addressed urgently, while possibly beyond the remit of the core plan, support and promotion of this area of work could provide a lot of work for starters or returners to work.

#### **Question 20**

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

The greatest enabler for service industries locally is reliable hi-bandwidth broad band. Given the advent of 5G provision by satellite we suspect there is little else to be achieved in this area.

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?
Yes ⊠ No □□
(Please explain your answer by providing additional detail where possible)
We would be delighted if Gravesham became a fully equal opportunity area; however we have no suggestions as to how this could be achieved.
Question 22
What measures should be undertaken to reduce levels of out commuting?
Yes □□ No □□
(Please explain your answer by providing additional detail where possible)
Given the scale of the recent NSIPs affecting this area (HS1, the London Theme Park and LTC) we would have thought that the majority of successful residents in the future living in Gravesham will be commuters. If it is you plan to have the majority of residents living and working here; we suspect you are creating a plan that will not be appropriate to our needs. If you are attempting to reduce commuting in order to reach our environmental objectives; then clearly better green public transport and communications will be required.  We suspect that the nomis data is not accurately reflecting more modern styles of
employment (operating through umbrella companies, Ltd companies and gig working).  It is our impression that a great many more people are effectively self employed and commute or work for remote clients outside the borough.
Question 23
Should the Borough Council continue to focus retail, leisure and recreation growth towards Gravesend Town Centre?
Yes □□ No 🗵
Are there any areas of the Borough in need of retail and leisure floorspace to support the local area and sustainability?

Given the change of direction signalled by the MHCLG's announcement of government policy on the 11<sup>th</sup> November 2020 (see Q3); it would be inappropriate to do so.

We believe the Council's best option at this time (which we regard as interim) will be to seek to protect the services (such as Post Offices and small retail centers) in the community at the present time. It is expected that they will continue to migrate their primary product offerings from goods to services and establish new markets for them.

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?

Yes, protect the retail core  $\Box$  No, diversify the retail core  $\boxtimes$ 

(Please explain your answer by providing additional detail where possible)

We would be concerned to see the retail core declining if protection denied opportunity to the areas. Given the expected changes to this area, we feel diversification should be allowed where it enhances the areas or allows them improved prospects.

# **Question 25**

Is the Borough Council's revised settlement hierarchy approach suitable?

Yes □□ No 🗵

Please provide details.

The revised settlement hierarchy incorporates hamlets and smaller communities into larger ones. We see this as part of the Council's agglomeration agenda, and as such is not suitable.

#### **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?

Consideration of the effects of changing technology (particularly on employment trends) are essential for future proofing this plan and are therefore incumbent upon the Council.

The effects of the covid-19 pandemic can already be seen to be accelerating change within the business environment; placing more emphasis on technology and telecom solutions while depressing further the high street and traditional industries. In this environment we have seen technology, telecoms and logistics providers profit, while traditional high street stores, hospitality and tourism have been trashed. It would be ill considered of the Council to ignore these trends, and short sighted not to plan for another pandemic.

Were the ubiquitous provision of cheap 5G mobile phone coverage via satellite swarms to be provided within the next two years it will dramatically affect the broadband and hence business environment. If such innovations are successful they will change the economic landscape, potentially re-invigorating the local economic environment while driving further decentralization of employment.

## **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, the housing requirement should be broken down $\Box\Box$
No, the housing requirement should not be broken down $oximes$
(Please explain your answer by providing additional detail where possible)
We object to this proposal as the Council has demonstrated no understanding of the local demand driven wholly and purely by those areas(wards). We understand this question to mean that the Council wishes to force it's arbitrary (10,480) housing plan onto the rural area.
Clearly the housing requirement for the Borough needs to be met by the Borough where possible in accordance with it's policies. If you can break down the demand (which we both know you cannot) by ward this proposal might have some merit. However since the Council appears set on planning for an arbitrary figure set by central government (which has no relation to the need within the Borough let alone the ward) our answer to this remains as per question 5 guided by the existing policies (i.e. the resulting plan will be remarkably similar to the one currently in existence).
Question 28
Which redistribution approach do you consider to be the most effective (A, B , C or D)?
$A \ \square \ \qquad B \ \square \ \qquad \qquad C \ \square \ \qquad D \ \square \ \square$
Are there any alternative approaches that should be considered?
None of the above approaches is fair or equitable. All are driven by the premise that houses must be built on the greenbelt (which we reject). The question is in itself unfair in that you have not defined within the supporting documentation the areas already planned and under development or due for completion within the timescales of the plan. Similarly you have failed to indicate the of brownfield sites that have not yet been developed. Clearly this question is a trap to control responses and not an open question about policy.
The developments need to be placed in existing brown field sites and greenbelt land only used where there is no harm to the greenbelt. If you take the stance (as we do) that your targets are incorrect; the answers are obvious. If you persist in promoting a damaging agenda for the effective removal of the greenbelt by adopting any of the above strategies the resulting harm to the greenbelt will outweigh any benefit from the development.
Question 29  Do you support the formation of Neighbourhood plans, should the council encourage their
establishment by local communities?

Yes 🗵

No  $\square$   $\square$ 

If yes should the council actively help with this?

Neighbourhood plans are an essential tool in protecting and empowering local communities. We note the government proposals on centralising the planning system were mute on whether Neighbourhood plans would have a role in future. However the formation of successful plans is usually beyond the means of smaller parish councils (as may be demonstrated by the failed Vigo Neighbourhood Plan). The Loose Neighbourhood Plan was of interest in that it identified no new housing, but was successful in gaining approval. It was however formulated by well qualified individuals.

Assistance in their formation would be very welcome.

<b>Question</b>	30
Oueshon	JU

Question 30
Do you agree with these criteria?
Yes □□ No 🗵
Are there any changes or additional criteria that you consider we should take into account?
We do not agree with the inclusion of item f.
Question 31
Should the Council continue with the Local Plan Core Strategy's existing approach of ensuring existing settlements do not merge?
Yes ⊠ No □□
If not, why?
It is not clear here what is being asked. We assume you are asking if the existing approach (as detailed in the existing and current core plan) should be continued.
Ougstion 32

#### Question 52

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

The borough has not clearly identified (in this consultation) the brownfield sites that currently have development potential and which are (or are not) being developed, together with the expected housing yield.

# **Question 33**

Are there any alternative approaches that the Council should consider?

The understanding of the government's direction has changed during the consultation. On the 16<sup>th</sup> of December the government published its response to consultation on the

#### white paper 'Planning for the Future' in which it stated:-

"We have listened carefully to the feedback on our proposals, within the consultation and outside of this, including in Parliament, through discussions with stakeholders and in the media, have heard concerns that the distribution of need was not right. In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities....

More broadly, 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."

In the light of this; we feel GBC is out of step with current thinking and should instead apply the principles of the NPPF – as they affect this borough. In the view of the majority of the respondents to consultation; your plans to allocate greenbelt land for housing will cause unacceptable harm.

Gravesham is unique and has 78% of its area currently within greenbelt protection. The borough needs to put the responsibility for protecting that above meeting arbitrary housing targets. And we believe that is both in line with government policy and the requirements of the NPPF. We want our Council to prepare a plan for our future – not one that has been suborned to temporal election slogans.

In our view; development on greenbelt cannot be sustainable, as you can never replace the lost green space.

#### **DUTY TO COOPERATE**

Your presentation does not detail the steps you have taken to ensure the duty to cooperate has been properly fulfilled. As we understand the law and the Sevenoaks ruling it is not adequate simply to ask and accept refusal. Grounds must be given and neighboring authorities held to account when they submit their plans to the inspectorate.

We are particularly concerned at the shortfall of housing (714 units) on the old Northfleet Cement Factory Land developed by EDC (EDC/16/0004). Had this been developed by GBC you would have insisted on 40 dwellings per hectare, not the 17 achieved by EDC. Under these circumstances EDC have a clear duty to take 714 homes from our requirements. Where is this shown in your consultation documentation?

# **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

# **Question 35**

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

#### Yes

However the we note you do not designate green spaces within the greenbelt, as the greenbelt protection is considered adequate.

The expectation of the people living here is that when a green space is designated it cannot be developed and must remain green. Your understanding of the protection offered by greenbelt designation is significantly less.

We would like the ability to designate green spaces in the greenbelt and in perpetuity.

#### **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 use the Local Green Space nomination form to nominate a site.

## What is the point of this question?

This has surely been dealt with by the recent green space designation consultation.

# **Question 37**

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

The existing infrastructure is due to be placed under intolerable strain by the proposed development of the LTC and London Theme Park. Luddesdown currently experiences very high loads of through traffic on it's single track road network due to excess traffic on the A2 A227 and A228. Further developments at Cobham and Sole Street (Meopham Camer Road) will lead to grid lock on the access roads to the village for large parts of the day denying access to emergency vehicles and residents.

The increases in traffic on narrow lanes which have no footpaths will create greater danger for NMUs. The lanes are also used by a large number of visitors who come to see the AONB.

There is a large deficit in secondary school places, 57 of this years applicants being refused entry to Meopham. GPs at Istead Rise each have nearly 4,000 patients registered, Meopham has only 3 full time GPs. There are no water mains in parts of Luddesdown, requiring private pipes up to 1 mile in length to obtain water. There are large sections of the parish with no mains sewage. Some areas draw power from Snodland leading to frequent power outages and the need to own a generator. We cannot see any provision within your plan to address these issues, and assume they will be dealt with ad hoc, at further cost to the greenbelt where deemed necessary.

#### **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?

(Please explain your answer by providing additional detail where possible)
We are not aware of your plans to improve public transport links and improve green transportation in the borough. As previously stated, there is currently no public transport in Luddesdown (the largest parish by area in Gravesham).
The Council needs to do more in this regard; suggest you promote green public transport and look to ensure all service vehicles carrying the GBC logo are electric.
Question 39
Do you agree that the Council should be addressing the Climate Change emergency proactively?
Yes ⊠ No □□
If not, why not and what are the risks involved in not taking suitable action at this stage?
We strongly support the Councils declaration of a Climate Emergency in the borough.
However, your proposal to remove land from greenbelt protection and convert it to an urban environment will increase the causes of climate change rather than deal with it's consequences. A recent report claimed 38% of greenhouse gas emissions from the UK resulted from the construction industry and 75% of global GHG emissions come from the urban environment and transportation. In contrast nearly all carbon capture initiatives require greenbelt in the form of forests or other forms of green carbon capture (carbon sequestration).  We fail to see therefore how your current development proposals will improve the
situation. Do you have any proposals to actually plant trees??
Question 40
Should the Council make provision for large-scale renewable energy generation?
Yes ⊠ No □□
The Borough has recognised wind resource, would you welcome wind turbines?
Yes □□ No □□
(Please explain your answer by providing additional detail where possible)
We are not keen on large scale solar farms or wind turbines. The wind turbine argument has not been fully discussed, but initial installations had a high carbon cost and short lifetime before needing replacement. Solar arrays are in our view damaging to the greenbelt; arguments to the contrary mostly being made by their proponents. But if the Council can demonstrate the lifetime benefits (from independent scientific studies)

Yes  $\square$   $\square$  No  $\square$ 

we will support them.

We would be in favour of small scale PV arrays, on roofs and the use of microgrid

systems. The integration of storage systems, PV array, electric vehicles and flexible tariffs could be used to work cooperatively to promote their effectiveness and increase market penetration. Perhaps the Council would consider promoting these schemes here such as those being proposed by bhesco?

## **Question 41**

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.
Yes ⊠ No □□
(Please explain your answer by providing additional detail where possible)
We are in favour of the Councils climate change objectives.
Question 42
Should strategic development allocations be required to make use of decentralised heating and cooling networks?
Yes □□ No □□
(Please explain your answer by providing additional detail where possible)
Not sure of the relative benefits; we would be guided by the Council on this.
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?
Yes ⊠ No □□
(Please explain your answer by providing additional detail where possible)
We are in favour of zero carbon build standards for all new builds.
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?

Yes ⊠ No □□

(Please explain your answer by providing additional detail where possible)

As previously answered we are in favour of the climate change initiatives being taken. We are however skeptical of the effectiveness of mitigation in general and prefer that developers to take responsibility for the impact their developments have on habitat loss directly (i.e. manage the impact of their developments rather than pay conscience money to someone else to manage it).

# **Question 45**

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

Yes ⊠ No □□

(Please explain your answer by providing additional detail where possible)

As previously stated we are in favour of climate change initiatives which seek to reduce our carbon footprint to zero.

#### **Personal Details**

#### Please provide your title and name

Cllr Noel Clark

Are you an agent responding on behalf of someone else? If so, provide their details below (name, address, telephone number and email)

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

#### Please provide your address including postcode

Leywood Farm, Leywood Road, Meopham, Kent, DA13 0UD noel.clark@luddesdown-pc.gov.uk

#### Please provide a telephone number

01474 813770

#### Please provide an email address if you have one

noel.clark@luddesdown-pc.gov.uk

Can we contact you about future Planning Policy consultations and progress related to the Gravesham Local Plan?				
X Yes	No			
Your Signature	Date			
Noel Clark (via email)	30 December 2020			
Upon completion, please return to: Planning Policy, Gravesham Borough Council, Civic Centre, Windmill Street, Gravesend, Kent DA12 1AU or by email to <a href="mailto:planning.consultation@gravesham.gov.uk">planning.consultation@gravesham.gov.uk</a>				
All comments must be received by <b>5pm on 10 December 2020</b> . Your address, telephone number, email address and signature will remain confidential, but your name, company (if relevant) and comments will be made publicly available. The Privacy Notice for this consultation is excitable at				
consultation is available at <a href="https://localplan.gravesham.gov.uk/gf2.ti/f/1210">https://localplan.gravesham.gov.uk/gf2.ti/f/1210</a>	0690/83693573.1/PDF/-			
/Privacy Notice 2020.pdf				