

URBAN GRAVESHAM

The Civic Society for Gravesend & Northfleet
www.urbangravesham.org

**1, Constitution Crescent
Gravesend
DA12 1JS**

Email:
jonathan.clay@btinternet.com
martin@mjmckay.wanadoo.co.uk

**Kevin Burbidge
Director of Planning and Regeneration Services
Gravesham Borough Council
Windmill Street
Gravesend**

9th December 2008

Dear Mr Burbidge

Application GRAVESHAM BOROUGH COUNCIL 20080696, Heritage Quarter. *Hybrid application (Outline permission & Full Planning Permission) for the demolition buildings & redevelopment of land in Gravesend Town Centre known as The Heritage Quarter (Split into the Western & Eastern Quarters). The Western Quarter being The West Street & St. George's Centre Car Parks, St. George's Church & Gardens, Part Of The Existing St. George's Centre & The River Walkway Between Elizabeth Gardens & Town Pier. The Eastern Quarter being Horn Yard & Market Square, St. Andrews Gardens and Clarendon Lawn, Royal Pier Road.*

This letter sets out the objections and other comments on behalf of Urban Gravesham, the Civic Society for Gravesend and Northfleet, in respect of the above application for planning permission. The objection is supported by a petition for in excess of 7,000 signatures opposing the development which has been collected in Gravesend town centre over the last two months. The letter is composed without prejudice to reserving our right to comment further in the light of responses to several letters which still await a response from the Council.

This letter has been the subject of full consideration by the Committee of Urban Gravesham and has its unanimous support. Membership of Urban Gravesham is open to all residents and workers in the Borough of Gravesham. It is non political and has no affiliation to any political party. It includes members of other residents and amenity groups within Gravesham and professionals from the field of architecture and town and country planning.

It is Urban Gravesham's firm recommendation that the Council should refuse planning permission for the development proposed. In the main this is because the scheme represents massive overdevelopment which will blight the centre of Gravesend. However, the application is incomplete and inadequate and in any case would require further consents for works to the listed St George's Church. The Environmental Statement fails to comply with the Environmental Impact Assessment Regulations in a number of respects and is incompetent and/or deliberately disingenuous, not least in its wholly inaccurate assessments of the effect of the development on conservation areas and listed buildings in Gravesend. Both the ES and the application itself are deficient and Urban Gravesham does not consider that the application can lawfully be determined by Gravesham Borough Council in its current form.

CONTEXT: OVERALL APPROACH TO REGENERATION

'The combination of a carefully maintained and enhanced historic structure and sympathetic modern development is generating unprecedented interest in Gravesend as a place to live and locate'.

(Gravesend Regeneration Review 1998-2003)

The historic environment lies at the heart of our sense of place; and England's most attractive and distinctive environments have always been sensitive to their context. Regeneration needs to be done with equal sensitivity if it is to create better places and stronger communities. Understanding how places change, and recognising the significance of their history, is the key to successful and sustainable regeneration.

(Regeneration and the Historic Environment – English Heritage 2005)

Recent regeneration policy:

For many years the Council has based its regeneration policy and action on a 'conservation led' approach. Sensitive infill schemes have been encouraged, a successful town centre management scheme has long been established, and a significant amount has been invested in the historic fabric (buildings and streets) by businesses, the Council and English Heritage. This has been successful enough for the town to win 'Beacon Status' for its regeneration efforts in 2002. The town centre is undoubtedly in far better shape than it was 15 years ago- it has more or less held its own in the face of competition provided by Bluewater and other 'out of town' retailing and it is an attractive place to live, work and visit.

The future

Urban Gravesham believes that this careful 'conservation led' regeneration approach should be maintained. It plays to Gravesend's strength as an attractive sub regional centre with a unique and interesting history and an outstanding riverside setting. Amidst the mass of new development envisaged as a part of the wider Thames Gateway project, Gravesend can still maintain its identity as a special place. Within this wider context its historic character will bring its own economic and social benefits and is the best basis for a healthy and vital long term future. The town centre still faces challenges and there is more to be done- but change needs to be managed carefully and with the agreement of the whole community.

Change in regeneration philosophy

There is no doubt that proposed development would represent a complete and abrupt break with the policy, pursued by successive administrations, of conservation led regeneration. We believe that it would be difficult to persuade outside funding bodies to continue to put in substantial capital funding to the Town Centre if the Council was at the same time supporting development which caused such damage to the historic character of the town. This would cause lasting, and possibly permanent damage, to the economic prospects of the town.

THE URBAN GRAVESHAM OBJECTION

'Design which is inappropriate in its context, or which fails to take opportunities available for improving the character and quality of an area...should not be accepted (PPS1- paragraph 34)

'Key objectives should include ensuring that developments ...respond to their local context and create or reinforce local distinctiveness'. (PPS1, paragraph 36)

Design which is inappropriate for its context, or which fails to take the opportunities available for improving the character and quality of an area... should not be accepted'. (PPS3 paragraph 13)

At the heart of the UG objection is the severe and irreparable damage which the development would cause to the historic character of the town centre of Gravesend. The models and drawings show every part of the scheme (not just the tower) to be grotesquely out of scale with its surroundings. As such the proposals put forward in the application are in direct and stark conflict with planning policy at all levels, including the policies in the Local Plan, the Kent Structure Plan, the Regional Spatial Strategy and National Planning policy guidance and planning policy statements.

Changes to the design will not address the fundamental problem of scale. All parts of the proposed scheme - the tower, the market development, the extension to the St Georges Centre must be reduced in size. For the developer this means that the number of proposed flats must be reduced, as must be the floor area of the proposed extension to the Centre.

Under the scheme proposals a very significant quantum of development is to be placed on St. Andrews Gardens. This is an area which has been available as of right and without hindrance for public use for many years. It is much loved by local people. Its loss to development of any kind- tower, wedge, or any other form, is therefore unacceptable.

The next few paragraphs lay out these objections in greater detail

The Tower

The Tower is completely out of context with the Heritage Quarter in terms of both scale and character. It would loom into views throughout the town centre, destroying the setting of numerous listed buildings, including Thames House, the Clarendon Hotel and St Andrew's Church. It would dominate the historic river front and would cause severe damage to views of Gravesend from Tilbury Fort (Grade 1 Listed) and from Windmill Hill, as well as numerous locations within conservation areas in the town centre. In short; it would forever cause dramatic and unwelcome change to the most highly valued part of the historic townscape of Gravesend. It is unthinkable that such an application should be permitted after the many years of careful and sensitive restoration of its historic character, lead by the Council and supported by, amongst others, English Heritage and the Heritage Lottery Fund.

Although secondary to the fundamental objection to any tower or tall building in this location, it should be noted that the architectural design of the tower is very poor. The use of a wide variety of materials is messy at best whilst certain elements- suburban windows, the arbitrary metal screen that wraps around part of the facade, and the lift shaft projection- are very crude indeed. The tower will be in no sense a worthwhile architectural 'icon'.

We object to the use of the term '5th icon' to describe the tower. The other 'icons' are places of civic or cultural importance - this private residential lump is iconic only by dint of its enormous size. It will stand to one side of the surrounding streetscape (old and new) on its own site and is therefore an isolated individual object rather than the focus of an integrated piece of townscape. The private nature of the tower and its lack of connection to the surrounding town means that, far from becoming a venerated 'icon', the tower will be resented by most people in Gravesend.

Market Square and West Street

Scale: Whilst the tower has been the most controversial and objectionable part of the proposal, it is UG's view that the other parts of the development raise further concerns on account of their scale bulk and massing. The Market Square area and the area round St Georges Church and fronting West Street, is probably the most historic

and yet fragile part of the fabric of the town, containing numerous buildings dating from the 18th and 19th Century and earlier, within a townscape whose mediaeval form and character is still apparent. In this context, the proposed development in the Market Square (6/7 stories in height) and in West Street (7—9 stories), is vastly out of scale. The Market Square development will loom over the High Street and will therefore forever impose itself on the heart of the area. The western portion of the development will loom over the riverside properties that line West Street and will create an extremely grim and shadowy street as the major approach by car to the town centre for many people.

Lack of Active frontages: The overall grimness of the scheme is exacerbated by the lack of ‘active frontages’ in many areas- along West Street the ground floor frontage consists of the ground floor of the multi storey car park, whilst the Market Square development sits on its own podium and will therefore be inaccessible from Bank Street or Queen Street. The attempt to integrate the development with the surrounding streetscape is therefore superficial and merely emphasises the inappropriate scale and form of the development.

Architecture: The design of the Market Development shows a crude assemblage of forms- butterfly roofs, exposed frames, an odd turret, and swathes of varying materials to provide a rather forced variety, rather than relying on good, elegantly worked urban design and architectural principles. This design will not *reinforce local distinctiveness* as encouraged by paragraph 36 of PPS1.

Little information is provided on the detailed design of the western part of the scheme. Such illustrations as exist, however, show a rather dreary design. The architecture does not appear to match the quality of the example used in the application design statement. We fear that members and others will thus be misled, and we doubt the architect’s ability to produce architecture of the quality required.

Information: We do not believe that the effect of the scale of the West Street and Market part of the development has been properly assessed. The 9-storey West Street development will form a very unattractive backdrop to St Georges Church from significant viewpoint to the East- for example.

The scheme –effect on Conservation Areas and Listed Buildings

The site currently comprises the most important and highly valued part of the historic riverside town of Gravesend; it's "Heritage Quarter". This area, perhaps more than any other part of the Borough, defines the local distinctiveness and character of the town as a historic riverside town.

Rather than protecting and enhancing this character, the development would cause serious damage to the character and appearance of the Town Centre Conservation Areas and to the setting of individual listed and other historic buildings, including the Grade II* listed Town Pier, recently sensitively restored by the Council after years of deterioration and neglect. Other listed buildings whose setting and character would be seriously harmed include the Clarendon Hotel, Thames House, St Andrew's Mission Church (by Street, who designed the Law Courts in London), numerous buildings in the High Street, the Grade II* Old Town Hall by AH Wilds and on the other side of the High Street, St George's Church and Church Yard with the statue to Pocahontas.

The application is seriously deficient in that the western part of the development, including the proposals round St George's Church and churchyard are in outline only. Although we are therefore unable to assess the full effect of the development on the historic buildings and the character and appearance of the Conservation Area, the illustrative material submitted with the application, such as it is, indicates that the scheme would be highly damaging.

St Andrews Gardens

The serious harm to the historic character of the town is compounded by the development of the large and important urban public open space at St Andrew's Gardens, the loss of which is directly contrary to national policy in PPG17. This loss is in the face of overwhelming opposition from the local community. This land is subject to an application by members of UG for its designation as a village green. Pending that determination, and if UG's application for a village green is successful, the development would not be able to proceed. The determination would be premature if it was to grant permission only to be incapable of being implemented due to the village green designation.

The application documentation suggests that the provision of the Clarendon Lawn as public open space would compensate for the loss of St Andrew's Gardens. It would not remotely do so, for a number of reasons:

- Clarendon Lawn is already open space which has, for many years, had unrestricted public access;
- Clarendon Lawn has been made over to the Council as public open space by a section 106 obligation which took effect on the grant of permission for the redevelopment of the Clarendon Hotel in 2007. It is therefore to be treated as existing public open space in any assessment of the impact of open space; and
- Loss of open space in this location is contrary to PPG17 paragraph 10, as it has not been demonstrated that the St Andrew's Gardens is surplus to requirements. No PPG17 compliant study has been carried out by the Council. Far from being able to demonstrate support for the proposals from the local community, as PPG17 paragraph 10 requires, the development has been met with overwhelming objection.

Link between east and west parts of the scheme.

Much has been made of the supposed economic link between the western and eastern parts of the scheme by Edinburgh House and the 'Yes to Gravesend' campaign in statements to the press and, we believe, in statements to Councillors and traders. It now seems to be commonly believed that the eastern part of the scheme, including the tower, is needed to 'cross subsidise' the extension to the St Georges Centre. Put very basically - if 600 flats are not achieved (including approximately 300 on the tower site) then, it is claimed, there will be no extension to the St. Georges Centre.

However, no evidence to support this notion is provided in the planning application, nor is it provided within the development agreement between Edinburgh House and the Council. We note that the latest statement by the Council on the development (Gravesend Reporter 27/11/08) refers to a report by King Sturge. We understand that this has not been submitted as part of the planning application. In any case, UG has been refused a copy of this document. We request that the lack of evidence for the interdependence of the eastern and western phases of the scheme is made clear in the planning report to members.

Lack of ambition

It is astonishing how little the Edinburgh House scheme appears to deliver. The scheme will provide many small flats. There are already a large number of flats and unimplemented permissions for flats within the town centre and there are proposals for thousands more immediately to the east and west. A couple of large, modern shop units, and a small hotel will also be provided (fine, in principle). Poorly paid part-time jobs will be created- 440 FTE post completion rather than the 1000 stated in the publicity given to the scheme (which refers to the numbers of jobs created during construction in addition to the number of jobs created post construction). Citizens will also have to wait a long time for the much vaunted shopping centre extension- the application states early 2014, although there is no guarantee within the planning application or the development agreement that there will be an extension at all.

The scheme does little to encourage the establishment of small and medium sized businesses- the life blood of a healthy town centre. It therefore sets aside Council and SEEDA strategies for encouraging 'entrepreneurship' and ignores a favourable Council feasibility study (Business Incubation Review 2004) on providing 'incubator workspace' within Gravesend town centre. That report noted that '*in the medium term demand for small, affordable workspace (for new and growing businesses in North Kent) will significantly outstrip supply*'. Given that the Edinburgh House scheme is the principal regeneration site in Gravesham and given the site's location at the heart of a diverse town centre, this major omission is not good enough. In addition, we find it very disappointing that this scheme does not attempt to grasp the economic development opportunities which will occur as a result of the fast rail links to London.

The proposals represent a major lost opportunity in that it fails to deal with long standing problems of traffic in West Street and the resultant severance of the town from the river. Whilst there are some minor pedestrian crossing improvements, traffic is not diverted or calmed. It is disappointing that the West Street/ Bath Street junction, the gateway to the town centre, is not conceived of as a new square, and instead remains as a traffic dominated roundabout. It's especially disappointing given that the quantum of development proposed immediately to the west of this in effect represents an extension to the central part of Gravesend.

The scheme fails to provide any additional new public and cultural facilities in the town centre as planning gain. The redevelopment of this area provides an opportunity for the provision of a major new cultural facility for the town centre in a stunning and unique riverside location – Gravesend’s South Bank area - which could include gallery, theatre, museum or other civic buildings. With the loss of this site to this development without delivering any meaningful cultural facilities, the best chance for such a scheme would be lost.

The Council has hitherto taken the approach that new investment can be used to attract public investment and benefits from gearing between private and public investment. This scheme appears to be concerned with delivering only commercial financial outputs, principally for the benefit of the developers.

Overall, we would expect a development valued at £150 million to be capable of yielding major benefits to the town. As the Council has refused to disclose any of the financial analysis in their possession and none was submitted with the application we are unable to see what, if any, other benefits are proposed, and their scale, but it seems on the face of it that the Council and the community are getting a very poor deal out of the development. We understand that the application has not been accompanied by either a section 106 obligation or even a suggested heads of terms, so we are unable to see what further contributions etc. would be provided with the development.

PLANNING OBJECTIONS

Lack of a planning framework

The Edinburgh House scheme has, by dint of its sheer scale, the most enormous implications for the built environment in Gravesend and its town centre. The scheme is coming forward ahead of the proper plan-led system and can only be judged by a set of policies (The Gravesham Local Plan Review 2000) which is completely out of date and was never, in fact, adopted as the statutory development plan for Gravesham. Effectively, there is no up to date local planning policy framework against which to assess the application proposals and to set the context for proper consideration of this major scheme.

In this respect, the proposals are contrary to the Policies and General Principles in PPS1. The application is wholly pre-emptive of the development plan process. We therefore do not think that it is possible to properly determine this scheme in accordance with national policy and section 38(6) of the 2004 Act and we urge the Council to reject it for reasons of prematurity.

There are further reasons why development of this scale should be delayed pending a proper plan-led process (including an area action plan) for the area:

- 1) Under the statutory plan-led process, the principle of development would be considered by an independent inspector at an examination in public or a public inquiry. However, instead of following the statutory plan led process, the whole future of the whole town centre is to be decided, once and for all, via a single planning application. This will wholly avoid the proper independent scrutiny which Parliament has laid down for land use planning.
- 2) Via its ownership of the land in question the Council is involved financially with this development. UG has already expressed its concern that the Council has failed to demonstrate the required impartiality in dealing with this application. It has lent its name and the outspoken support of its officers to the developer's promotion of the application through publicity, and played the developer's promotional CD Rom in the planning department's own reception area. Most recently the Council has published documents in the local press which are partial, inaccurate and paint an exaggerated and unfair picture of the proposals. In contrast, an Area Action Plan as a part of the LDF process would test and consult on a number of options. It would facilitate wide and proper consultation before coming to a relatively impartial conclusion.
- 3) The planning application covers most of the developable area of the town centre and will therefore shape the entire future of the centre. To decide the future of the whole centre via a single application is wholly inappropriate.

We also note that Gravesham produced a draft 'Tall and Bulky Buildings Policy' in 2004 but has so far neglected to take this through to adoption. This is despite the strong advice in the English Heritage/CABE note on tall buildings- that local planning authorities should adopt such guidance. There is therefore no proper framework for considering the role and design of tall buildings within Gravesham.

A hybrid application

We note that the application is fully detailed with regard to proposals to the eastern part of the Heritage Quarter (phase 1), but is only outline for the Western portion (phase 2). There are serious dangers in allowing the application in its current form. There is nothing in the planning application or development agreement which would prevent the developers from proceeding with the more lucrative first phase and neglecting to proceed with phase 2. This would produce none of the economic regeneration benefits that may be associated with the enhancement of the retail area.

This notwithstanding, phase 2 impinges greatly upon St Georges Church and its surrounds. There is simply not enough information to assess its full impact. The determination of an outline application in this circumstance would therefore be contrary to guidance in PPG 15.

Environmental Statement:

The documentation which supports the application wrongly claims that the development framework for the proposal accords with the key aims of national, regional and local planning policy. The Heritage Quarter is a unique area with its own problems and pressures and qualities. Other than the non-statutory council development brief for the area (which no longer seems to be available), there is a specific policy vacuum for the area.

Although we have been unable (despite numerous requests) to obtain a copy of the development brief, we note from the EIA that one of objectives of the brief is *'enhancing the 'urban grain' of the town and at the same time respecting the scale, massing, and height of existing buildings where appropriate'*. It is not at all clear how the development *'accords with this aim'* as is claimed in the executive summary of the ES.

The assessment of the effect on the High Street conservation area is woefully inadequate. The tower is considered to have a 'minor adverse' impact (not credible) and there appears to be no assessment of the effect of the rest of the western quarter development, nor the eastern quarter, on the High Street conservation area. The basic

thesis outlined in the summary of the ES - that development on existing car-parks is better, in townscape terms, than leaving the car-parks undeveloped- is an extremely weak and inadequate justification for a scheme which is grossly over-scaled.

The ES does not mention the job losses that will occur because of the scheme. Whilst it does tabulate the number of FTE jobs created there is no assessment of this against the council's economic development strategy.

This chapter also quotes selectively from PPS3. No mention is made of the lack of a mix of housing provided by the scheme- a monoculture of small studio, one and two bedroom flats. There is no attempt to show how the scheme '*contributes to the creation of mixed communities*' as required by paragraph 24 of PPS3. We note that the application contains no section 106 Obligation and accordingly it is impossible to see the extent of, and the means by which, any benefits are to be secured. In this respect the application is deficient.

We find the overall assessment of daylight and overshadowing (generally negligible) difficult to believe. The tower will certainly cast some properties into near permanent shadow. We note that seven and nine-storey development along West Street will cast the lower floors of existing properties into shadow. As importantly, it seems that the Street itself- the major means of access to large parts of the town centre, and therefore major part of the character of the town centre overall- will be overshadowed to a very large degree. None of this is pulled out or explained in a meaningful way by the ES. In general the conclusion of the ES reflects the generally casual and partial assessments of the benefits (or otherwise) of the scheme.

Overall, the ES is unreliable and highly biased. To go further, the principal authors of this letter are both professionals in the field of town and country planning. We have seen and used many Environmental Statements in the course of carrying out our everyday jobs. In our joint opinion, the Environmental Statement which accompanies the application is the most partial and inaccurate statement which we have ever seen in support of a development. In fact, so disingenuous is the document that it cannot be taken as providing a true assessment in accordance with the Environmental Impact

Regulations, as it fails to properly carry out the required impact of the development on the environment. In this respect the application is deficient.

The Planning Department should demand a complete rewrite of the Environmental Statement before considering the application any further.

Non-compliance with planning policy

By dint of its enormous scale, the development proposal is wholly contrary to the development plan and published, adopted and emerging policies at all levels; national, regional and local, which seek to protect and enhance the historic environment and to encourage and defend local distinctiveness.

It would fail to create successful mixed communities, providing almost entirely small flatted development with, so far as we can see, no family housing. The provision of new retail development in the town would be welcome, in principle, but the form of this development is unacceptable.

We also note that commuted payment for affordable housing is proposed in lieu of providing affordable housing as part of the scheme and that the project will only provide 10% affordable housing on site, far below the national requirement of at least 30%. Given that this is the major town centre development of nearly 600 dwellings this is unacceptable and contrary to PPS3.

The Council has successfully used its residential layout guidelines over many years. The Commission for Architecture and the Built Environment (CABE) is, through its draft Thames Gateway Design Pact, encouraging other local authorities in the Thames Gateway area to adopt similar guidance. It is therefore appropriate that the same, proper standards are brought to bear on this scheme. However, many of rooms in the tower fall below the minimum sizes laid out in the Council's adopted residential layout guidelines. Similarly, the requirement of 10 square metres of amenity space per flat is not met. The development will therefore provide substandard living conditions as compared to new development elsewhere in the Borough.

The Heritage Quarter Strategy

Despite repeated requests UG has been unable to obtain a copy of the Council's Heritage Quarter Strategy. Although it appears that this document would provide the basis of an appropriate approach to the development of the Heritage Quarter, it has never been the subject of public consultation and enjoys no status as SPG or SPD.

What is clear, however, is that the proposed development is in serious conflict with the Strategy. This is surprising, given that the development claims to be in accordance with the strategy, and the Development Agreement requires the development to be in accordance with the Strategy.

The 2007 Conservation Area Appraisals

Although these documents have yet to be formally adopted and published in their final form, we understand that such publication is imminent and as SPD would provide perhaps the only properly produced development plan documents of any kind against which to assess the proposals.

However, from drafts which we have seen, the development would be in direct conflict with the appraisals. For example, the St Andrew's Gardens, lost or seriously eroded by the proposals, is recognised as an important green space on the riverfront. These appraisals are capable of being a material consideration of considerable significance and should be given significant weight in determination of the application. The determination of the application would pre-empt their publication.

THE DEVELOPMENT AGREEMENT

The Council appears to give weight to the Development Agreement between the Council and the Developer in the determination of the planning application. At the Council meeting on 7th October much was made by Councillors of the effect of the Agreement and the loss of funding to the Council if the development does not proceed. However:

- The financial consequences of the failure to grant planning permission is not a planning matter, nor indeed is any other aspect of the development agreement a planning matter. We would expect the report to Members on the application to make this point absolutely clear.
- The Agreement is not a statutory document, has never been the subject of consultation and was unpublished at the time of the most recent local elections. It has no standing in the determination of the applications and UG seeks the assurance of the Council that it will not be treated as a material consideration in the determination of the application.
- The Development Agreement is not publicly available and has been withheld from the public. It has never been the subject of any public consultation and the public are only able to know, on request, limited parts of the document.

CONCLUSION

This application illustrates a brash, ill-conceived scheme, destructive of all that is special in the town centre. The tower may well place Gravesend on the map- but for all the wrong reasons. If the aspiration is to be a vibrant, successful place within the Thames Gateway, then Gravesend should seek to achieve that by embracing its unique architectural and historic inheritance. Instead, this proposal will overwhelm and submerge that character. This approach is demonstrably contrary to a range of local and national policies. As an approach to regeneration, this proposal is fundamentally misconceived. It will fail.

This scheme is a once and for all chance for Gravesend town centre. It is therefore important that the scheme delivers, not just on design, or on being spectacular, but on a whole range of levels. Looked at in this context, the Edinburgh House scheme is too big, too brash, too destructive of valuable green space, too unsophisticated and simply not good enough. It would cause devastating harm to the historic character of the town. We think that there is a scheme to be done by the Council in partnership with Edinburgh House- but not this one. There is only one option:

‘Back to the drawing board’.

We wholly reject the assertions made in support of the application, that the only alternative to a scheme of this nature is no regeneration. With the arrival of the high speed rail link to London, there can be no doubt that there will be considerable developer interest in the town centre. The current collapse in the development economy provides an opportunity for the Council to produce the proper statutory local development framework against which major development can be assessed, in consultation with the Gravesham community.

It is wholly unacceptable that the development is being assessed and guided by a secret agreement between the Council and a single developer and in the absence of an up-to-date local development plan.

UG remains willing to participate in the planning and consultation processes. However, we think that sensible discussions can only be facilitated by removing the threat of this scheme. Only then can there be a detailed discussion about the future of the town centre. We are very willing enter into discussion with the Council and the developers provided that they are in turn willing to review their approach to the development of this area and are prepared to consider the withdrawal or refusal of the planning application.

Yours sincerely

Jonathan Clay

Chair

Martin McKay

Vice Chair

Urban Gravesham

The Civic Society for Gravesend and Northfleet

Cc Brian Russ, Gravesham Borough Council

