

Ebbsfleet Development Corporation consultation: BSHF response

About BSHF

The Building and Social Housing Foundation (BSHF) is an independent housing research charity committed to ensuring that everyone has access to decent and affordable housing, and holds Special Consultative Status with the United Nations Economic and Social Council.

Since 1994 BSHF has organised an annual series of in depth consultations at St George's House, Windsor Castle, on a range of housing issues. Notably, the consultation in May 2013 focused on *Creating the Conditions for New Settlements in England*, which forms the basis of this submission.¹

For further information regarding this submission, please contact:

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1. Do you agree with the proposal to create a Development Corporation at Ebbsfleet, Kent?

With the boundaries of the Ebbsfleet site covering three local authority areas, there is a need for a unified body to take forward development effectively. The achievements of the New Town Development Corporations and, more recently, the Olympic Park demonstrate the scale of delivery possible when bodies are conveyed with the appropriate powers to deliver significant development.

However, there is a need to learn lessons from the past, particularly the problems associated with the New Town Development Corporations (BSHF: www.bshf.org/published-information/publication.cfm?lang=00&thePubID=DA16820B-D4AE-52C7-70495EE78A4F3D3C).

- How will local democratic accountability of the Development Corporation be ensured? The New Town Development Corporations were often imposed without considering the wishes of local people. While it is welcome that the Development Corporation will be expected to work with local authorities and communities, it is not clear how this will be ensured.

¹ McFarlane, M., Pearce, J., Ciaglia, A., Czischke, D. and Pattison, B. (2013) *Creating the Conditions for New Settlements in England* www.bshf.org/published-information/publication.cfm?lang=00&thePubID=DA16820B-D4AE-52C7-70495EE78A4F3D3C

- The process of handing back power to the local authority at the end of the Development Corporation's life must be given due consideration at the outset. The process of transferring powers from New Town Development Corporations to local authorities encountered a number a problems that affect some New Towns to this day (Transport, Local Government and the Regions Committee:
www.publications.parliament.uk/pa/cm200102/cmselect/cmtlgr/603/603.pdf).

Furthermore, while the focus of the consultation is not the details of the Ebbsfleet development, there is a need to consider the remit of the Development Corporation. In the legislation, the role of the Urban Development Corporation is to "secure the regeneration of its area", but an understanding of what this entails is not considered.

- Many regeneration schemes have led to gentrification, with local people from poorer backgrounds displaced and unable to experience the benefits of development. It is crucial that any development undertaken in Ebbsfleet is for the benefit of existing and surrounding local communities, including the provision of genuinely affordable housing.
- It is proposed that the Ebbsfleet Development Corporation delivers a "garden city", with an aspiration for "a vibrant and cohesive place where people will want to live and work". While these aspirations are welcome, there is a need for greater clarity about what is meant by a garden city, including recognition of garden city principles (Town and Country Planning Association:
www.tcpa.org.uk/data/files/TCPA_Garden_City_Principles_Note_20140411.pdf). The government must set out a clear vision for what the Corporation will achieve; although, of course, it must be for local stakeholders to shape the details of this vision.

2. Are you satisfied with the proposed boundary of the Ebbsfleet Development Corporation, as set out in Annex A?

It is vital that the Development Corporation area is effectively integrated with existing urban areas. It is therefore essential to consider what will happen at the fringes of the development and how the Development Corporation will work with local authorities to ensure that the Ebbsfleet proposals fit with Local Plans.

There needs to be explicit consideration of how the Duty to Cooperate will apply between the local authorities and the Development Corporation, along with greater clarity as to what the Duty Cooperate entails. The Communities and Local Government Select Committee has called for "a framework for local authorities to work within, outlining what actions local authorities should take in their duty to cooperate, how they measure success or failure, how parties may insist on the delivery of what has been agreed and default options if there is inadequate cooperation" (CLG Committee www.publications.parliament.uk/pa/cm201011/cmselect/cmcomloc/517/517.pdf). This should include a mediating body such as the Planning Inspectorate intervening in cases of impasse (BSHF: www.bshf.org/published-information/publication.cfm?lang=00&thePubID=DA16820B-D4AE-52C7-70495EE78A4F3D3C).

3. Do you think there are any areas which should be added into the area of the Ebbsfleet Development Corporation?

BSHF has no particular comment to make on this question.

4. Do you think there are any areas which should be taken out of the area of the Ebbsfleet Development Corporation?

BSHF has no particular comment to make on this question.

5. Do you agree with the proposals to give the Ebbsfleet Development Corporation the planning powers as set out in the consultation document?

It is essential that comprehensive and consistent planning powers are made available to Ebbsfleet Development Corporation to ensure that a cohesive approach is taking to planning within the proposed development site.

However, it is important that measures are taken to ensure local democratic accountability with regard to planning decisions. Not only must local people have the opportunity to be consulted and listened to with regard to planning applications, but there must also be a way to hold the planning authority to account. When the local authority is responsible for planning this occurs through the usual electoral routes. This will not be the case for the Development Corporation and there is therefore a need to consider how local accountability can be conserved.

6. Do you agree with the proposal for the Ebbsfleet Development Corporation to have 11 Board members?

BSHF has previously proposed New Settlement Partnerships (NSP) as a means of delivering large-scale developments in a collaborative way (BSHF: www.bshf.org/published-information/publication.cfm?lang=00&thePubID=44CDCE4C-D4AE-52C7-704914AC4E9BE266). This approach offers insights into the stakeholders that should be included on the Ebbsfleet Development Corporation board.

In particular, communities must be well represented on the board and have power to influence development. Representation from the three local authorities is welcome, but these should be elected representatives, chosen by the community specifically to represent them on the Ebbsfleet Development Corporation Board.

Furthermore, while the inclusion of 11 board members is welcome in that it enables representation of a wide range of interests, it is essential that the balance of power within the board does not undermine the community role. If Ebbsfleet is to be a successful new settlement that meets local needs and aspirations, community representation that is backed up by effective power within the board is essential.

Supplementary questions

About you

7. Are you responding on behalf of:
 - An organisation which represents individuals and groups (e.g. charities, Trade Unions, environmental interest groups, housing associations, local authorities etc).
8. Is your home, your land, your business, or the business/organisation where you work situated inside the proposed area of the Ebbsfleet Development Corporation shown at Annex A?
 - No
9. Is your home, your land, your business, or the business/organisation where you work situated outside of the proposed area of the Ebbsfleet Development Corporation?
 - Yes, but outside of Dartford and Gravesham
10. Please provide details of where your home, your land, your business, or the business/organisation is if it is not in Dartford or Gravesham.
 - Other England
11. If you are answering in your capacity as a resident, do you:
 - Not applicable
12. How long have you been in your current location?
 - Not applicable
13. Besides your home or business, do you own, lease or rent any additional property, business or non-domestic premises/landholdings within the proposed area of the Ebbsfleet Development Corporation shown at Annex A?
 - No
14. Besides your home or business, do you own, lease or rent any additional property, business or non-domestic premises/landholding outside of the proposed area of the Ebbsfleet Development Corporation?
 - No
15. If you are a business, how many people are currently employed in your company?
 - Not applicable
16. If you are a landowner, developer or business, do you have any planning applications within the proposed area of the Ebbsfleet Development Corporation still awaiting approval?
 - Not applicable
17. If you are a landowner, developer or business, do you have any planning applications outside of the proposed area of the Ebbsfleet Development Corporation still awaiting approval?
 - Not applicable
18. If you are responding on behalf of a trade organisation or representative organisation, how many members do you have?
 - Not applicable
19. If you are responding on behalf of an organisation that represents people or groups, which of the following does your organisation speak for? Select all that apply.
 - Residents
 - Businesses
 - Landowners/Developers
 - Workers

- Conservationists/Environmentalists
 - Not applicable
 - If other, please specify...
20. How did you hear about the consultation? Please select all that apply.
- Department of Communities and Local Government website
 - UK Press (national, regional and local)

Equality and Diversity

21. Please indicate your age
- Not applicable
22. Please choose one option that best describes your ethnic group
- Not applicable
23. Please indicate your sex
- Not applicable
24. Do you think the proposals put forward in this consultation would have any impact, positive or negative, on individuals based on the following protected characteristics?
- Not applicable