



Application: 20230731
Your Reference: EDC/34/0086

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

To: **Ebbsfleet Development Corporation**
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet Kent
DA10 1EE

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Former Northfleet Cement Works**
The Shore
Northfleet
Gravesend
Kent DA11 9AN

and being **EDC Consultation EDC/23/0086 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of Outline Planning Permission reference no. EDC/16/0004 for Land North East of College Road (Phase 3A) comprising the erection of 273 no. dwellings together with associated infrastructure including details relating to finished floor and site levels, noise attenuation measures, ecological mitigation and enhancement strategy, and schedule of public open spaces (condition 9), renewable energy, water conservation and carbon reduction technologies (condition 11), community facility (condition 14), design and maintenance of the public realm and other areas with a public amenity function, provision of and timetable for installation of public art and heritage interpretation (condition 15).**

Referred to in your application dated 5 July 2023.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/23/0086), and is a consultation in respect of the reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of Outline Planning Permission reference no. EDC/16/0004 for Land North East of College Road (Phase 3A) comprising the erection of 273 no. dwellings together with associated infrastructure including details relating to finished floor and site levels, noise attenuation measures, ecological mitigation and enhancement strategy, and schedule of public open spaces (condition 9), renewable energy, water conservation and carbon reduction technologies (condition 11), community facility (condition 14), design and maintenance of the public realm and other areas with a public amenity function, provision of and timetable for installation of public art and heritage interpretation (condition 15) of that planning permission.

In respect of the documents the subject of this consultation, the EDC is advised that in response to internal consultation it has received the following responses:

GBC Housing Development

I have the following comments on three documents submitted as part of the application to EDC ref EDC/23/0086 :

- o Phase 3A Affordable Housing Statement 30/05/23
- o Typical Floor - Tenure Strategy
- o Ground Floor - Tenure Strategy

I note that 82 affordable housing units are provided in this phase out of the 273 dwellings and that this equates to a policy compliant 30% of the total number of units in that phase. I am therefore satisfied that the number of affordable dwellings proposed is correct.

Also, in accordance with the S106 Agreement for the scheme, the tenure of the affordable housing meets the 60/40 split in favour of shared ownership.

However, in terms of the sizes of the rented homes I note that all homes are to be provided as flats. Looking at all phases on the site I note that there have only been 8 houses made available for rent. I would therefore request whether Bellway are able to provide any affordable houses for rent amongst the 82 total affordable housing units on this phase.

As affordable rented homes are needed for different household sizes, some of the 18 x 2 bed 4-person affordable rent flats should be provided as 2 bed 3 person homes.

There are 24 x 1 bed 2 person flats for shared ownership proposed. From experience of the shared ownership and RP market for shared ownership, I consider this number too high and would suggest a cap of 12 x 1 bed 2-person shared ownership flats, converting the remaining 12 to 2 bed 3 person flats.

Finally, the 4 x 1 bed 2-person wheelchair accessible flats should be made available for rent rather than shared ownership as there is more demand for this type of accommodation for rent.

I would welcome a discussion with Bellway and the current RP as to whether the affordable housing mix can be changed to diversify the affordable housing sizes of accommodation.

GBC - Highways Officer

I believe the cycle parking strategy does not allow for charging electric cycles that have batteries built into the frame, or for the independent secure storage of deluxe cycles. That may cost several hundred if not thousands of pounds. Whilst it is accepted that not everyone will own such cycles it is deemed appropriate that some limited provision should be made. It is also unclear what if any provision has been made for adaptive cycles which can also be used by the mobility impaired and so should be pepper potted around the development to ensure they are closely associated with every property on site.

Drainage Strategy seems appropriate, but this will be considered in more detail by others.

Lighting Strategy should be considered by others, if this is not the case then more details should be submitted including a detailed lighting design.

Car parking. It is disappointing that some parking bays appear to have minimal if any visibility when placed adjacent to walls etc, suitable visibility panels should be incorporated to ensure that drivers do not emerge blindly into the path of another vehicle or pedestrian. It is also noted that some cycle stores have doors that open obstructing access/egress to/from a parking space or more importantly its pedestrian access, again potentially a hazard, particularly for the mobility impaired which although minimal should be avoided.

Transport Note. I have concerns regarding the possible under provision of car parking given the adopted Ebbsfleet Development Corporation Parking Standards, but only time will tell if the provision is adequate, unfortunately there is no possibility of increasing parking should it become necessary. I note other than Fastrack the roads will not be adopted, meaning the maintenance and parking enforcement will be an additional cost that residents will need to fund in a period, at least at present of high inflation. It also means that if funds are not available, or the management company decides for other reasons, parking enforcement or maintenance may not take place. The visitor parking provision is inadequate compared to the requirements of Kent County Council which requires a 20% provision based on the number of dwellings or 55 spaces instead of the 16 proposed. Whilst it is noted that there are very good public transport links east to west through Gravesend, the same is not true for visitors approaching from the north or south.

The sight line shown on drawing 332410098_300.100_007 is appropriate for a 20mph target speed, yet there only seems to be a speed table at the junction to control vehicle speeds. The Kent Design Guide suggests that speed restraint features are required at 60 metre intervals to achieve a target speed of 20mph. Given the Fastrack route is a principle means of access to the development and the use of Fastrack should be encouraged there is potentially greater merit in a design speed of 25mph which requires 33m x 2.4m x 33m which should be achievable and requires according to Kent Design speed restraint features at 100 metres and is suitable for a Major Access Road rather than a minor access road which would serve some 100 dwellings.

GBC - Licensing
No comment received.

GBC - Parking Services
No comment received.

GBC - Environmental Protection

We are interested in the noise part of the application however I have checked the EDC portal for this and note that the only recent noise submission is the 57 page Northfleet Embankment West Phase 3A Planning Condition 9b Acoustic Report.

There does not appear to be a noise technical note that EDC's own noise consultants have produced.

We will not be commenting on the full acoustic report and we await the submission of the Technical Note which we will then comment on.

GBC - Conservation
No comments received.

In terms of the proposed landscaping, we would like to see native landscaping implemented with a variation of species within the scheme and a suitable planting schedule and management plan. GBC would also advise that any comments/recommendation from KCC Biodiversity are taken into consideration.

The EDC is requested to consider the recommendations from the Borough Council's Housing Strategy and Development, Highways Officer, Parking Services, Environmental Protection and Conservation Officer's.

The EDC is thanked for consulting the Borough Council.

Dated this 17th day of August 2023

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Assistant Director (Planning)
Planning Service