

PD14069/JWB/AP

Email: jon.bradburn@montagu-evans.co.uk
alex.partridge@montagu-evans.co.uk

70 St Mary Axe
London
EC3A 8BE
Tel: +44 (0) 20 7493 4002

Katherine Parkin,
Planning and Regeneration Services,
Gravesham Borough Council,
Civic Centre,
DA12 1AU

By email only.

23rd February 2024

Dear Katherine,

**NORTHFLEET HARBOURSIDE – LAND SURROUNDING EBBSFLEET UNITED FOOTBALL CLUB, BOUNDED BY
LOWER ROAD, RAILWAY LINE, GROVE ROAD THE RIVER THAMES – APPLICATION REF. 20221064
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICANT RESPONSE TO RESPONSES RECEIVED DURING APPLICATION DETERMINATION**

Montagu Evans submitted a planning application to the Gravesham Borough Council (“GBC”) in October 2022 on behalf of our client, Northfleet Central 1 Limited (the “Applicant”), seeking out outline permission for the redevelopment of Northfleet Harbourside. The Application was validated by the Council on 3 November 2022.

The proposed description of development as shown on the GBC validation letter is:

“Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.”

Following the submission of the Application, a number of comments have been received, alongside requests for additional information in respect of a number of topics. A previous comprehensive response was provided in respect of this application in August 2023.

Since the original submission of the application Gravesham have published their Five Year Housing Land Supply Statement 2022-2027 (March 2023) which identifies a five year housing land supply over this period of just 2.90 years. Additionally, the nationally published Housing Delivery Test results for 2022 were published in December 2023, identifies Gravesham

as achieving just 53% delivery of its required homes between 2019 to 2022. These indicators emphasise a high level of need for housing within the Borough that isn't being achieved currently.

The December 2023 NPPF update places greater levels of emphasis on the utilisation of previously developed land and sites that are physically well-related to existing settlements should be encouraged (Paragraph 89). Chapter 11 (Making effective use of land) further sets out that as much use as possible of previously developed land. Ultimately policy at the national level provides strong support for development on previously developed land and that decisions should give substantial weight to the value of using this category of land to meet housing need.

Further changes to the NPPF which are currently being consulted upon by Government seek to place greater emphasis on the use of brownfield land for housing delivery, with proposed changes which would inter alia expect planning authorities to give significant weight to the benefits of delivering as many homes as possible especially where this involves previously developed land.

Given the Council's position on housing supply it is clear that the 3,000 homes that the Northfleet Harbourside project would deliver on a well connected brownfield site should be given significant weight in the determination of the scheme.

Statutory Consultee Comments

During determination a number of comments were received from statutory consultees. Work has been undertaken to resolve the matters raised and we can confirm that all parties are supportive of the scheme and the information provided. The table below sets out the responses received, as well as an overview of the Applicant's response.

Updated information has been provided to the Council for formal re-consultation to be undertaken with these parties, and the final set of information on highways is included with this letter which will allow the Council to undertake a 21-day neighbour consultation.

COMMENTS RECEIVED	SUMMARY OF RESPONSE	INFORMATION SUBMITTED
SE England Coast Path National Trail Officer received – 9th October 2023	The Applicant has actively engaged with PROW officers and held a meeting on the 6th February to discuss final queries and agreeing the approach, the SE England Coast Path National Trail Officer confirmed by email to the case officer that subject to the agreed revisions they were satisfied on 7th February 2023.	This has been incorporated within response documents to Natural England and PROW Officer provided to GBC Officers on 9th February 2024.
Natural England Consultation Response received - 20th November 2023	Following the provision of NE's a DAS meeting was pursued and response prepared and provided in advance of a meeting. The DAS Consultation meeting held on 16th January 2024 with NE case officers and further email correspondence to and agreed position.	Following this meeting the formal response was issued to the Council 9th February 2024

COMMENTS RECEIVED	SUMMARY OF RESPONSE	INFORMATION SUBMITTED
Kent County Council received – 24th November 2023	Following these comments a response on Highways and PROW was issued with meetings to discuss with KCC officers held on 1st February 2024 and 6th February 2024. Following these discussions a further finalised response is being prepared for issue on the 14th February 2024 to address outstanding Highways queries.	Following this meeting and further correspondence the formal response was issued to the Council 23 rd February 2024.
Environment Agency Engagement – 5th February 2024	The Applicant team has undertaken pre-application discussions with the Environment Agency to discuss the proposal and address any queries. Meetings with EA Officers were undertaken to discuss comments on the 19th January and 30th January 2024.	Upon agreement of approach the finalised Flood risk assessment and surface water drainage strategy has been provided to GBC and EA on the 5th February 2024.

Closing

We trust that the above and enclosed is self-explanatory and in order, and will now allow the Council to reconsult and move to take the application to planning committee. If you require anything further, please do not hesitate to contact Jon Bradburn (jon.bradburn@montagu-evans.co.uk / 07818 012 452) or Alex Partridge (alex.partridge@montagu-evans.co.uk / 07584 154 762) at this office.

Yours sincerely



MONTAGU EVANS LLP

Enc.