



Growth and Communities

Genna Henry
Planning and Regeneration Services
Gravesham Borough Council
Civic Centre,
Windmill Street,
Gravesend,
Kent DA12 1AU

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: Francesca.Potter@kent.gov.uk

BY EMAIL ONLY

8 September 2022

Dear Genna,

Re: EIA Scoping Opinion for a proposed development at Land Surrounding Ebbsfleet United Football Club, bounded by Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend (Northfleet Harbourside) (Ref: 20220852)

Thank you for consulting Kent County Council (KCC) on the request for a Scoping Opinion for the proposed mixed use development of up to 3,500 residential units, up to 55,000 sq.m (GEA) floorspace of Use Class E, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F) alongside the delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road.

The County Council has reviewed the Environmental Impact Assessment (EIA) Scoping Report and sets out its comments below, following the order of the report.

Scoped in Topics: Socio-economic

Education: The County Council, as Education Planning Authority, welcomes the opportunity to have early sight of the proposals for Northfleet Harbourside.

Given the scale of the proposals it is clear that the development will have a significant impact on education provision which will need to be mitigated accordingly.

The Scoping Report acknowledges the subject of school provision by stating:

"There are several primary and secondary schools within the surrounding area. The

closest primary schools are Lawn Community Primary School (approximately 800m southeast) and Manor Community Primary School (approximately 1km southwest). The nearest secondary school is Ebbsfleet Academy (approximately 800m southwest)",

At present, however, a detailed assessment of the availability of school places does not appear to have been undertaken.

The Scoping Report does acknowledge that there is a need to work with the Department for Education and KCC to understand pupil yields and required infrastructure. If new education provision is required, there is no clear indication that this could be accommodated within the development itself.

The current capacity for both primary and secondary provision is at, or near, capacity across much of the Boroughs of Gravesham and Dartford. This is borne out by the latest projections received for primary school provision in both Dartford and Gravesham, and it is clear that a development of this size would result in the need for additional primary school places. The tables below clearly show that the planning areas which would be most heavily impacted by the Harbourside Development are already under pressure in terms of Reception Year and Year 7 places.

Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
Northfleet	140	4	14	5	-2	0	-3	-3	-4	-3	140

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
Swanscombe and Ebbsfleet	330	37	50	45	28	-9	-16	-21	-23	-28	360

Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
NS - Gravesham and Longfield	1,324	-14	35	-110	-50	-93	-110	-123	-139	-110	1,340
SG - Gravesham and Longfield	420	-28	-5	-61	-35	-54	-57	-61	-67	-59	420

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
NS - Dartford and Swanley	1,200	9	41	9	40	-6	-9	-45	-88	-103	1,260
SG - North West Kent	720	-4	-29	-40	-24	-42	-48	-63	-76	-84	720

Without a provisional estimate of what the housing mix will be, KCC cannot provide robust assessments on what the pupil yield may be. The County Council also recommends that there is likely to be need for Special Education Needs provision, youth services, early years (nursery) provision and adult learning. The County Council would therefore welcome engagement from the applicant to ensure that the necessary education infrastructure to support the development and mitigate its impact is provided.

Sports and Recreation: The County Council would recommend that the applicant ensures opportunities for active travel are integrated into the development to enhance connections between services and communities, and limit car use where possible. The development must also deliver adequate provision for traditional sport as well as informal activity, play and recreation and consider how these spaces are accessed. The County Council would also recommend consideration of Sport England design guidance¹.

The applicant should take note of the [Active Lives Survey](#), which provides continuous measurement of the number of people taking part in sport across the nation and in local

¹<https://www.sportengland.org/facilities-planning/active-design/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>
<https://www.sportengland.org/facilities-planning/active-design/>

communities. The latest figures support the case that inactivity significantly impacts on an individual's physical and mental health, as well as social/community development. Therefore, any development needs to consider this and seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes and open spaces.

Scoped in Topics: Traffic and Transport

Highways and Transportation: The County Council, as Local Highway Authority, has been involved in initial meetings with the applicant's transport consultant to scope the requirements of the Transport Assessment to determine the likely trip generation, distribution and potential mitigation of any impacts in accordance with the National Planning Policy Framework. The development is of sufficient scale and in a location which provides an opportunity to deliver some significant transport infrastructure and service improvements, and the applicant has been encouraged to take advantage of the KCC Kent Transport Modelling Service to facilitate a speedy and thorough assessment.

Scoped in Topics: Archaeology

Heritage Conservation: In respect of heritage conservation matters, the County Council provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 24 August 2022 (Appendix A).

Scoped in Topics: Ecology and Biodiversity

Biodiversity: In respect of biodiversity matters, the County Council provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 26 August 2022 (Appendix B).

Scoped out Topics: Water Resources and Flood Risk

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 25 August 2022 (Appendix C).

Scoped out Topics: Minerals and Waste

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 16 August 2022 (Appendix D).

Waste Management: The proposed development includes provision of up to 3,500 residential units within the district of Gravesham. KCC, as Waste Disposal Authority, is required to dispose of kerbside collected waste and also provide a service for householders to dispose of any additional waste brought directly to one of its recycling centres. The Pepperhill Waste Transfer Station (WTS) and Household Waste Recycling Centre (HWRC)

located at Station Road, Southfleet currently serve the whole of the Gravesham District – and are already at capacity.

The Scoping Opinion proposes that 'Waste and Materials' are 'scoped out' of the EIA as they consider that significant effects relating to waste and materials are unlikely. The operational development impact is described in paragraphs 458-463 and appears to conclude that, as the waste arising from the development is only 0.3% of the total waste arising from Kent, that the resultant impact is negligible. Conclusions also appear to have been based upon review of landfill void capacity alone.

The conclusion that landfill is the only final disposal option for waste in Kent is incorrect. KCC disposes of less than 2% of waste to landfill, this is not kerbside collected household waste. All household waste is diverted, either to an energy from waste facility or to multiple recycling facilities, where waste is recovered and treated as a resource for recycling or energy production. The EIA must have consideration of the capacity at these alternative final disposal facilities will need to be made, despite the proposed mitigation stating that sufficient storage and equipment/provisions will be in place to deal with separate waste streams.

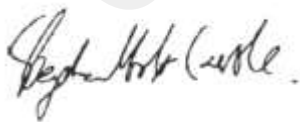
Additionally, in order for waste from developments such as that proposed to reach these final disposal facilities, it must first be taken to a Waste Transfer Station for bulking. As stated above, the whole of the Gravesham District is currently served by a single transfer station, which is already at capacity. Provision of an additional 3,500 homes will place an unsustainable burden of demand upon KCC waste disposal services and therefore informed mitigations should be identified within an EIA.

Overall, the EIA must have consideration of waste management and KCC recommends that the matter is addressed within the EIA, alongside the development of a Waste Disposal Strategy. This Strategy should be developed and mitigation agreed through engagement with the Borough and County Council as Waste Collection Authority and Waste Disposal Authority accordingly.

The County Council will continue to work closely with the Borough Council to help to ensure the delivery of new housing and infrastructure in response to local needs. The County Council will welcome further engagement with the Borough Council and the applicant as this planning application progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Director for Growth and Communities

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Appendix A: Heritage Conservation response dated 24.08.2022

Appendix B: Biodiversity response dated 26.08.2022

Appendix C: SuDS response dated 25.08.2022

Appendix D: Minerals and Waste response dated 17.08.2022

Gravesham Borough Council