

NORTHFLEET HARBOURSIDE, APPLICATION REF. 20221064
APPLICANT REPONSE TO AY / GBC COMMENTS

This version issued by Montagu Evans on 29 August 2023 – v1.

Topic	AY Review	GBC Comments	Applicant's Response
	Principle of Development		
Minerals Safeguarding	Additional information required / conflict with policy. The exclusion of urban areas from the MSA has already been applied in the KMWLP. However, the Applicant applies an exclusion beyond the MSA for the site noting that it falls within the Urban Settlement Area and therefore, as per the KMWLP, the mineral resource is already sterilised by non-mineral development with very little prospect of future working. Relying on the justification within the KMWLP and MWS SPD that urban areas are sterilised, the Applicant contends that there is little prospect for working the site and the minerals are already depleted & the safeguarding designation is not applicable. The above has not been substantiated by any meaningful investigation of the site and it has not been demonstrated the site is sterilised. Additionally, it has not been demonstrated that any of the exception criteria of Policy DM7 have been met and subsequently that the development complies with the development plan with regard to minerals safeguarding. It must be demonstrated that the development would meet at least one test of Policy DM7 and complies with the NPPF, specifically paragraph 212.		As per the submitted Planning Statement, the Site is subject to the following designations under the statutory development plan with regard to minerals: - Mineral Safeguarding Area (Sub-Alluvial River Terrace Deposits); - Gravesham Borough Council Urban Boundary / Village Confines (as per the Kent Minerals and Waste Local Plan 2013 – 2030 (adopted 2020)); and - Gravesham Borough Council Land Allocations (as per the Kent Minerals and Waste Local Plan 2013 – 2030) (adopted 2020)). The Planning Statement points out the tension between adopted policy (Kent Minerals and Waste Local Plan), including the proposals map, and supporting documentation in the designation of land within the urban area for mineral safeguarding. As noted, the Inspector's Report on the Examination of KMWLP Early Partial Review and Kent Minerals Sites Plan, issued in April 2020, notes at paragraph 40 that "Urban areas are excluded from the MSAs as the mineral resource is already sterilized by non-mineral development with very little prospect of future working". Furthermore, paragraph 3.5 of KCC's March 2021 Safeguarding SPD states that: "For practical reasons, urban settlement areas...are excluded from the Kent Mineral Safeguarding Areas". We note that the Committee Report associated with the Albion Waterside scheme (application ref. 20210270) sets out at under the heading "KCC Minerals and Waste" that "With regard to safeguarded land-won minerals, the application is coincident with Sub-Alluvial River Terrace Sands and Gravel. Therefore, the application details should normally include a Minerals Assessment to determine if the safeguarded mineral deposit is being needlessly sterilized, and if not whether an exemption to mineral safeguarding pursuant to Policy DM7: Safeguarded Mineral Resources of the Kent Minerals and Waste Local Plan 2013 – 30 can be invoked. However, the application site is within the built confines of Gravesend and is thus exempt from land-won mineral considerations". Given the parallels between the two sites and the applicable designations, we consider that the same conclusion must be drawn in respect of the Northfleet Harbourside application.
Loss of Robin's Wharf / Impact on Port of Tilbury	Additional information required / conflict with policy. The site boundary includes most of the Wharf. The landing crane and landing stage of the Wharf fall outside of the red line boundary. Paragraph 5.37 of the Planning Statement notes that the pier (assumed to be the landing stage) is outside of the red line of this application and remains in situ. Policy DM8 requires one of seven criteria to be met to permit the loss of Robin's Wharf. The MIA considers criteria 3, 6 and 7. Although the MIA refers to criteria 3, it does not identify a suitable alternative site. The	At present the application fails to provide sufficient evidence to demonstrate that the proposed development will safeguard existing wharves, or that additional wharfage is readily available.	An updated Minerals Impact Assessment has been prepared by Wardell Armstrong and is appended (Appendix 1) to provide an updated position on the substantial capacity available within other wharves – sufficient to accommodate Robins Wharf. As per this document, Robins Wharf is occupied by Brett Aggregates and Aggregate Industries who share the facilities and utilise them for importation of aggregates for direct sale or supply into added value products. The proposed loss of the facilities associated with the operations of BA and AI falls to be considered against applicable policies in the statutory development plan. Policy DM 8 of the Kent Minerals and Waste Local Plan (2020) "sets out the circumstances when safeguarded minerals and waste

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			development may be replaced by non-waste and minerals uses" (para. 7.6.2). The policy identifies a number of criteria, the satisfaction of one of which is noted as being sufficient to support the granting of planning permission for development that is incompatible with safeguarded minerals management, transportation or waste management facilities. Criterion 6 refers to "material considerations indicate that the need for development overrides the presumption for safeguarding". As per KCC's Safeguarding SPD, this criterion "allows for development where it can be shown that development is of such importance that the need for it to take place outweighs any impact that might result on the operation of the adjacent minerals and waste facility. In the determination of such proposals, the need for the development will need to be weighed against the need to retain the safeguarded facility, the scale of potential impact and the objectives and policies of the development plan as a whole". As set out later within this document, the delivery of residential development amounting to up to 5.3 years' worth of the borough's unconstrained housing need is considered "critical within the context of the need for the exploration of Green Belt release and the stalled delivery of housing across Kent due to nutrient neutrality issues". In other words, the Northfleet Harbourside site is one of the few brownfield development sites within Gravesham which offers the opportunity for the delivery of a quantum of housing that would release pressure on other more constrained sites. Linked to this, we acknowledge the PoLA's point that the Local Plan does not consider the loss of the wharf to be necessary in achieving development within the area, and that Policy CS03 Northfleet Embankment and Swanscombe Peninsula East OA envisage the protection of the wharf. We disagree with this assertion, however. As set out within the application submission, the Northfleet Harbourside application offers a unique opportunity to deliver a comprehensive development wherein complementary land uses are delivered together in a mutually supportive transformational scheme. The increase in residents to the area will support the delivery of retail floorspace, community and leisure floorspace, and will be positioned as enabling development for the delivery of a new stadium at the heart of both the community and the Site. The comprehensive development of the site is a necessity. The benefits of the proposed development are clearly identified within the submitted Planning Statement, including and not limited to: • 2,250 direct jobs across a wide range of sectors – a net increase of around 1,750 on the estimated number of jobs currently based on site; • 925 net additional jobs for local (Gravesham) residents; • £69 million in additional GVA for Gravesham; • £20 million per annum in residential retail and leisure expenditure; • £5.6 million in additional Council Tax receipts, plus an uplift of £1.1 million per annum in business rates compared with existing uses; and • Retention of retail expenditure within Gravesham.

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			- The delivery of up to 3,500 new homes, including up to 350 affordable homes, as above making a significant contribution to housing delivery in Gravesham; - Improvements to the public realm; - Retention of Ebbsfleet United Football Club, presenting an enhanced community offer; - Significant improvements to the pedestrian environment in terms of air quality, noise and vibration; C. 10ha of new publicly accessible open space and a 400% increase in biodiversity habitats. In addition to the above, we are cognisant of GBC Local Plan Policy CS07, which refers to Economy, Employment and Skills, and sets out at para. 5.1.36 that "The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5), or [our emphasis] appropriate alternative provision is available or will be provided as part of the rationalization of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities". The accompanying MIA prepared by Wardell Armstrong (Appendix 1) concludes that there is sufficient capacity in the existing Wharves in Kent (currently at 61% capacity) and that the loss of the individual site capacity of Robins Wharf (c. 304,000 tonnes) can be accommodated by the other safeguarded wharves. On this basis, whilst we acknowledge that we cannot comply with Policy CS07 insofar as demonstrating that the existing infrastructure is unviable or that demand is lacking, it is demonstrated that there is alternative provision through excess capacity elsewhere. On this basis, the loss of the existing wharf falls to be balanced against the significant social, economic and environmental benefits arising from the scheme, as fully detailed within the submitted Planning Statement and ES. Consideration of the impact on the Port of Tilbury is set out below under Impact on Neighbouring Amenity.
Loss of Employment Uses	Additional information required. Policy CS07 resists the loss of employment uses, unless it can be demonstrated that the proposed development would provide at least the same quantum of jobs. The socioeconomic assessment notes that the development would provide an increase in employment opportunities. From a planning policy perspective, the development would appear to comply with policy CS07. Notwithstanding this, we refer to the accompanying Employment Review, which sets out the additional information required. - Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation measures for sensitive interfaces, additional consideration of delivery and phasing and clarification on the future plans for or loss of Robins Wharf - Thorough engagement process with existing businesses to inform decision making on relocation with the scheme or to alternative premises.	The applicant has provided a statement intending to show that the development would result in a net gain in employment and a range of other benefits that weigh in its favour. However, it is understood that whilst the application sets out the maximum level of floorspace to be created in different Use Classes, these are all based on 'up to' when it comes to the main employment generators.	The requirement for market evidence does not apply to the consideration of the loss of existing employment, therefore we deal with this point where it is repeated below under 'Offices'. As part of the S106, the Applicant is willing to commit to the delivery of a business relocation strategy, wherein affected businesses are consulted on the requirements linked to their departure from the site and / or relocation to alternative suitable premises. It should also be noted that where possible, steps will be taken to explore the accommodation of existing businesses in space within the new development. Given that the planning application does not seek approval for minimum parameters, in order to allow for a robust socio-economic assessment, assumptions were required with regards to establishing conservative, yet reasonable, minimum parameters for the purposes of assessment. A 10% reduction to the illustrative parameters was

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			deemed suitable in this instance based on professional judgement with regards to the minimum parameters that could come forward as part of detailed design. These minimum parameters assumptions align with (i.e., fall within) the parameters sought for approval by the planning application, as defined by the Parameter Plans, Design Code and Planning Statement. This approach was agreed with the Applicant planning team, and is one that has been taken on a number of other projects in establishing reasonable assumptions for the purposes of assessment for outline planning applications. For clarity, as set out within ES Volume 1, Chapter 6: Socio-Economics and Health, minimum parameters have been defined to allow for assessments relating to minimum residential accommodation provision, residential yield, and non-residential floorspaces. This has allowed for reasonable assessment scenarios regarding employment creation, business rates receipts, housing delivery, household expenditure and council tax receipts.
Town Centre Uses	Additional information required. Refer to Northfleet Retail & Leisure Planning Policy Issues, which concludes that the following additional information is required: • A financial impact assessment for the convenience good floorspace element of the proposal. • A financial impact assessment for substantial amount of proposed food and beverage floorspace. • Confirmation from the application that it wishes the proposed comparison goods floorspace to sell all types of comparison goods without restriction. • ME / the Applicant to provide a full copy of the raw household survey data commissioned for this planning application. • As part of its updated analysis, ME to provide a forecast pattern of trade draw for the comparison, convenience and food/beverage floorspace from each of the study area zones. • The applicant wishes GBC to rely on viability issues associated with the linkages between the main land use elements, then we would recommend that GBC ask for further information on this issue, particularly as non-town centre uses are currently being included in the assessment of alternative locations. • Further information is required in relation to the Applicant's approach to flexibility for scale and format when assessing alternative sites. • Given that Ebbsfleet Development Corporation have raised concerns over the potential impact of the proposal planned investment at Ebbsfleet Central, further information and analysis on this issue is recommended (from both the Application and also EDC). • In addition to the information already submitted on the town centre health checks, we consider it would – land uses and market share. Finally, whilst it is common to consider the need for appropriate conditions towards the end of the determination process, we consider that a without prejudice discussion between the Applicant, GBC officers and AY would be beneficial at this stage in order to help guide the application of the sequential and impact policy test. In particular, it would be useful to discuss, on a without prejudice basis: (A) retail and food/beverage unit sizes; (B) range of retail goods to be sold; (C) maximum net / gross floorspace quantum; (D) any flexibility within Use Class E. • Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation	The Northfleet Harbourside application appears to ignore the extant Bluewater permission for a significant extension on the basis the remaining floorspace may not be delivered. In the interests of robustness, this should also be included in the assessment.	The accompanying Addendum Retail and Leisure Statement prepared by Montagu Evans (Appendix 2) sets out detailed responses to the list of comments provided in respect of this topic. It is concluded that the proposed development is fully in accordance with national and local retail and leisure policy. In respect of the request for a market evidence report to provide a more detailed evidence-based approach to the selection of uses, quantum of floorspace and geographical distribution of the site, this is not considered relevant or justified in respect of town centre uses – although has been provided in respect of offices and hotel use, as per comments below. The planning requirement in respect of town centre uses is to undertake an assessment of impact (as per the NPPF), rather than an assessment of need. The assessment of impact has been robustly demonstrated in the submitted Retail and Leisure Statement, and Addendum Retail and Leisure Statement. Reference to a business relocation strategy is set out above.

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	measures for sensitive interfaces, additional consideration of delivery and phasing and clarification on the future plans for or loss of Robins Wharf. Thorough engagement process with existing businesses to inform decision making on relocation with the scheme or to alternative premises.		
Community Uses	Additional information required/ advisory comments. Community uses as part of mixed use development are supported by Policy CS10. The proposal incorporates up to 9,300 sqm GEA of community uses with the following breakdown: 1,100 sqm GEA local services uses, 1,500 sqm GEA health care space, 1,500 sqm GEA nursery/creche, 1,200 sqm indoor sport and recreation, and 4,000 sqm GEA local community use. Noting the proposals for 3,500 new homes and significant other floorspace, it has not been demonstrated that the proposed provision of community floorspace would be sufficient to meet the needs of the proposed development. The HIA notes that local primary schools have an excess of 177 pupil places, which would not meet the needs of the development. Existing primary schools will need to be expanded to meet demand. However, there is sufficient excess capacity within existing secondary schools in Gravesham and Dartford. The Planning Statement notes that S106 contributions towards education are to be confirmed at reserved matters stage for each phase. The ES notes that contributions towards education have been considered acceptable in principle by GBC & KCC, noting the range of development schemes in the area and KCC's ambitions to put these towards expansion of local schools. Notwithstanding the above, the proposed unit mix is heavily skewed towards one-bed units (66%). The unit mix has a direct impact on the child yield derived from the proposals and the number of primary school places required to meet the needs of the development. The Council must review this to ensure it would be acceptable. Subsequently, the HIA should be undertaken with a unit mix agreed with the Council. The community benefits of the new stadium are dependent on agreement of an appropriate community use agreement with the football club. The Applicant should confirm their willingness to enter into such agreement, with input from Sport England. - Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation measures for sensitive interfaces, additional consideration of delivery and phasing and clarification on the future plans for or loss of Robins Wharf - Thorough engagement process with existing businesses to inform decision making on relocation with the scheme or to alternative premises.		It is unclear whether the identified need to demonstrate that 'the proposed provision of community floorspace would be sufficient to meet the needs of the proposed development' relates the quantum or type of proposed space. In respect of quantum, as per the submitted Planning Statement, the proposed development seeks to deliver up to 3,500 new homes and up to 4,000 sqm (GEA) Use Class F2 community floorspace. This is in addition to healthcare space (up to 1,500 sqm GEA), creche or nursery uses (up to 1,500 sqm GEA), and the ability to use facilities within the football stadium and their own outreach programme.. The accompanying ES assesses the sufficiency of the proposed community infrastructure to accommodate population growth as follows: - Sufficient capacity for nursery / creche space; - On-site provision meeting increased demand for GP Surgery capacity, with additional capacity being available to help address deficits in provision elsewhere in the local area. In respect of primary and secondary school places, as noted in the AY comments, S106 contributions are to be allocated to delivering increased provision to respond to increased demand. The above is directly related to unit mix. We set out below commentary as to the acceptability of the proposed unit mix. In addition, the proposed development is centre on the delivery of a fit for purpose 18,000 sqm (GEA), 8,000 pax football stadium that will provide a financially sustainable future for that Ebbsfleet United FC. The new stadium will address current facility shortfalls as well as providing a facility that will allow it to be promoted to higher divisions in the league. The wider scheme supports the ability for the Club to remain at the heart of the community and not leave the area to expand, ensuring that it becomes a facility that accommodate not only sporting fixtures, but community events and charity outreach. Furthermore, the delivery of public spaces within the proposed development – including the multi-functional amphitheatre space in the Riverside Neighbourhood area - will create a 24/7 community environment. Detailed discussion regarding play space and open space is set out later, however it is considered that the proposed development delivers sufficient open space. In respect of the type of local community uses to be delivered, no specific occupier has at this stage been identified, with the objective being to allow as much flexibility at reserved matters stage as possible in response to ongoing consultation with discussion with the LPA, the local community, interest groups and charities..

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			Reference to a business relocation strategy is set out above.
Offices	Additional information required / policy conflict. To note, the Retail and Leisure Statement states that the acceptability of the other commercial uses, including the proposed hotel and office space is addressed in the Planning Statement. The Planning Statement considers alternative sites within 500 metres from Ebbsfleet Station. However, this falls short of the requirements of sequential test, noting specifically that Policy CS07 requires sites in Gravesend Town Centre to be considered first, then edge of town centre locations and sites within 500 metres from Gravesend Railway Station or Ebbsfleet Station be considered. Consideration of sites within Gravesend Town Centre has not been undertaken. Furthermore, the site falls outside of the 500m distance from Ebbsfleet Station and the site should therefore be treated as an out of centre location. Policy CS07 of the Core Strategy requires proposals for office development exceeding 2,500sqm floorspace at the Site to be supported by an Office Impact Assessment. Noting the Site's out of centre location, alongside only a partial key site designation (the majority of the site is not allocated for development in the Core Strategy), an Office Impact Assessment is required. The Site has not been identified in the Core Strategy as contributing towards the delivery of 133,500 sqm of employment floorspace (Policy CS03) and has the potential to affect the designated centres, which must be fully considered to meet the policy requirements. - Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation measures for sensitive interfaces, additional consideration of delivery and phasing and clarification on the future plans for or loss of Robins Wharf - Thorough engagement process with existing businesses to inform decision making on relocation with the scheme or to alternative premises.		GBC have confirmed that an Impact Assessment is not required in respect of office floorspace, as per the NPPF. In comments issued on 19 May 2023, officers note that <i>"For the sake of completeness, policy CS07 at paragraph 5.1.31 requires impact testing for office development outside of town centres exceeding 2,500 sqm floorspace. However, this policy requirement was designed to be consistent with NPPF (2012) paragraph 26. Such testing of impacts is no longer required under national policy with NPPF (2021) paragraph 90 now only referring to retail and leisure development"</i>. In respect of the request for a sequential assessment for the proposed office floorspace, this use forms part of the wholesale redevelopment of the site as part of the delivery of a mix of supporting uses and in conjunction with that element of the scheme. Given this is bring brought forward as a single phase and physical entity, it cannot be divorced from the other component parts. As such, there are no other sequentially preferable sites capable of delivering the stadium scheme. We acknowledge the Ebbsfleet Central proposal which will deliver a significant amount of office floorspace as a different proposal to that set out within the Northfleet Harbourside application. In the case of Northfleet Harbourside, the office use is proposed as complementary to the other proposed uses and part of the wholesale redevelopment of the area. It is anticipated that an element of the office floorspace will be taken up by the commercial and charitable arm of EUFC. Further potential occupiers are referenced in the Office Market Review, as set out below. An additional Northfleet Office Market Review (Appendix 3) has been undertaken by Montagu Evans and is appended. This noted that whilst the Northfleet office market is relatively unestablished, as evidenced by limited take up and leasing transaction, it is identified that this is a symptom of restricted supply in the submarket, with minimal supply of efficient Grade A space being available. It is also noted that the Applicant's commercial enterprise will occupy a significant element of the proposed office floorspace. In addition, it is noted that interest has been expressed by two major multi-national corporations, although details remain confidential at this stage. Reference to a business relocation strategy is set out above.
Hotel	Additional information required. Policy CS09 supports the delivery of visitor accommodation with proximity to the riverside or close to the A2 – both of which the Site benefits from. Additionally, the principle of a hotel at the Site – without the need for a sequential test – has been established by virtue of the extant planning permission, albeit the approved hotel is of a significantly lesser scale than proposed. It should be demonstrated that the quantum of hotel development is required to meet proposed local needs. Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation		As recognised by AY, the principle of hotel use on the Site has been established by way of the extant planning permission ref. 20170221, approved by GBC in June 2017. This application concerned the "Demolition of the Plough End Stand and ancillary buildings and erection of a replacement Stand (Phase 1B), integrated 55-bedroom hotel together with new access, parking and ancillary facilities". Furthermore, this consent establishes the principle of a hotel use linked to the ongoing and evolving operation of the stadium, with the Committee Report noting that "The intention of the hotel is that it will provide integral guest accommodation to compliment the enhanced sporting, community and conference facilities at the ground" (para. 3.8). It is further nots that "whilst the hotel would be available for use by general members of the public, it is intended to have a

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Replacement Football Stadium	Advisory comments. The principle of a replacement football stadium is supported in policy terms and by Sport England, noting that the replacement facility would be larger than the existing and would be a higher quality.	There does not appear to be much information on how the proposed development would actually achieve any of the above objectives in terms of providing the necessary facilities for the club to operate at up to EFL Champion level; allow for	As per the accompanying Needs Case (Appendix 5), the proposed development in the round seeks to: Create a place and precinct of a multi-use commercial, leisure, retail and residential development in which the

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	The Planning Statement notes that the investment to the football stadium to the level proposed is only achieved through the introduction of town centre and residential uses of the scale proposed. Whilst a viability appraisal has been submitted to justify the affordable housing position, there does not appear to be any evidence which demonstrates the scale of the development proposed is required to support the delivery of the replacement stadium and maintain a 'critical mass of visitors' to support the non-football functions of the stadium. If the Council are of the view that the development is of a density unsuitable to the location, additional justification for the proposed density should be sought, including clear demonstration that it is required to deliver a key public benefit of the scheme – the improved stadium. - Additional information requested re. a market evidence report to provide a more detailed evidence based approach to the selection of uses, quantum of floorspace and geographical distribution of across the Site; mitigation measures for sensitive interfaces, additional consideration of delivery and phasing and clarification on the future plans for or loss of Robins Wharf - Thorough engagement process with existing businesses to inform decision making on relocation with the scheme or to alternative premises.	the funding of the new stadium; or for the club to be viable in the long-term, sustainable and self-sufficient moving forward. For example, there is no outline business plan for the club that relates to the above to show that this level and form of development is required to achieve these objectives, how this relates to financing capital improvements and the future revenue expenditure of the club. It would be helpful, therefore, if the applicant could provide a detailed statement on this so the Council can properly evaluate the proposal and understand how the business model would work. Consideration should also be given in this respect to any implications that might arise should only the first phase be built out rather than the whole development. What consideration has been given to the way in which the stadium would function and the need to manage incidents.	Stadium will be the heartbeat for the new and existing community; - Deliver a new 8000 seater stadium that will retain the home of the football club in Northfleet in perpetuity on the site the club was founded and has traditionally occupied; - Provide residential housing to assist the borough in achieving required dwelling targets and to provide revenue and funding to support the construction of the stadium and community areas; and - Provide conference and event space in a severely under-supplied market for the local community and business community, as well as providing on-going non-football related revenue for the club to survive and flourish in the future. As set out within the Needs Case, "the proposed development and scale of the retail, commercial and residential aspects of Northfleet Harbourside will allow the club to fund the new stadium, whilst also making the site viable to advertisers and sponsors for naming rights and other digital and commercial advertising options". The comment regarding market evidence is not considered to be relevant in respect of the stadium, given the unique opportunity for the delivery of this facility in this location. Reference to a business relocation strategy is set out above. In respect of the potential delivery of only one phase of the development, as set out above, the requirement to deliver the redevelopment of the Stadium requires the development of the Site as a whole to be brought forward. If any part of the proposed development cannot be delivered, the redevelopment of the Stadium will not be achievable. Further information regarding emergency access arrangements associated with the proposed stadium can be provided at reserved matters stage.
Residential Use	Advisory comments. The delivery of 3,500 housing units weighs in favour of the development, in the context of a chronic and sustained shortfall of housing delivery and GBC's current inability to demonstrate a five year housing land supply. The presumption in favour of sustainable development and paragraph 11d of the Framework must be considered. Although it is noted that paragraph 11d is only engaged if the proposals are found not to conflict with the Framework as a whole. Furthermore, the principle of residential use in this area is supported by the policy context, albeit Policy CS03 sets out aspirations for residential development within the opportunity area and notes an indicative capacity for 200 homes on sub area 1.3, part of which falls within the site boundary. As above, the Council must determine whether it considers the proposed density suitable to the location – this consideration must be viewed in the wider context of housing need in the borough and GBC's current housing supply position.		As set out within the submitted Planning Statement, paragraph 124 of the NPPF sets out that "Planning policies and decisions should support development that makes efficient use of land, taking into account: - The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; - Local market conditions and viability; - The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; - The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and - The importance of securing well-designed, attractive and healthy places". Paragraph 125 of the NPPF further notes that "Where there is an existing or anticipated shortage of land for meeting identified

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			housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site". In addition, it is noted that "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework". As per the comments provided by AY, GBCs latest Housing Land Supply Statement, published in 2020, confirms that the Council is unable to demonstrate a deliverable supply of sites for housing against its housing requirement over the next five years from 2020 to 2025. Given that GBC is exploring options including Greenbelt release to meet housing need, it is considered that the delivery of what would amount to 5.3 years' worth of the borough's unconstrained housing need, it is considered that, as per the AY comments, the delivery of a significant number of residential units on this Site is "critical within the context of the need for the exploration of Green Belt release and the stalled delivery of housing across Kent due to nutrient neutrality issues".
	Quantum of Development and Phasing		
Phasing / Construction		Phase 1 is intended to be built out whilst businesses in Phase 2 remain operational. The ES advises that existing wharf areas in Phase 1 will be utilised as a construction compound during the construction of that phase. However, Phase 1 is not adjacent to the river and whilst businesses remain operational in the area designated as Phase 2, it will not be realistically possible for Robins Wharf which is not currently within the ownership of the applicant to be used for construction purposes. As such this discrepancy needs to be reconciled. No clarity is provided regarding how businesses within Phase 2 can remain operational, whilst Phase 1 is constructed and occupied. The DAS makes reference to a phasing and delivery strategy. More detailed and evidenced based thinking should be provided on this to minimise impact on vitality of existing businesses and functioning of the industrial economy. This can build on, and tie into the relocation strategy detailed at point 2. Moreover, the paper should move beyond purely technical considerations to address how the phasing of development can build a deliverable masterplan and quality of place based on key anchors. An indication of how the presence of power lines running across the site would be dealt with during construction would also be useful.	The identified phasing shows that the scheme would broadly be brought forward in two phases. This is, at outline phase, a core indication to provide an indication of the approach that would be taken. It is expected that there would be a more detailed series of sub-phases which will be required to deliver the scheme, ensuring that the first phase is to deliver the realigned road network that allows for the ongoing operation of other businesses in the area. This will be informed by more detailed design work, as well as a wider CPO strategy, all based on information that is not available at this time and for which the outline permission is required. It is expected that a more detailed phasing strategy would be secured by way of condition or s106 obligation to provide the detailed required on how the masterplan can come forward from both a technical and place-making perspective without detriment to the businesses in the wider area. In respect of construction, the Applicant has instructed the preparation of a Construction Management Plan, which is appended as a working draft (Appendix 10). This document references development phases and construction methodology regarding pylons and can be expanded and finalised in response to an appropriately worded condition.
Quantum of Development		No indication is provided regarding what the minimum quantum of development maybe, nor what the minimum building heights maybe. Nor is information provided regarding how the viability of the stadium and football club would be impacted, should the maximum development not come forward as proposed. A narrow strip of land immediately abutting the Creek itself; a knob of land at the mouth of the former creek now behind the flood defences; and the existing wharf that protrudes into the	The proposed maximum quantum of development is considered to represent the realistic ultimate quantum of development across the site. In simple terms, should the delivery of 3,500 homes not be achieved, the realistic outcome is that the redevelopment of the stadium would also not be achieved. In terms of land outside of the red line, it is noted that at the present time, the Applicant does not have the ability to access this land and therefore has not been able to accurately determine the requirements for its change of use or removal.

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		river just outside the red line boundary...could become 'space left over after planning' detrimental to the future regeneration of the area.	
Housing Density	Housing Advisory comments. Policy CS15 of the Core Strategy promotes the delivery of higher density developments in suitable locations close to Ebbsfleet station. However, the overarching consideration set out in the policy is whether the density is consistent with delivering good design and does not compromise the distinctive character of the area in which it is situated. The acceptability of the housing density proposed must therefore be considered in conjunction with the design, scale and appearance of the development. This must be weighed against the density set out in Policy CS03 of the Core Strategy – which seeks to deliver 1000 dwellings across the key sites in the opportunity area and only 200 in sub area 1.3. The Council must determine whether it considers the proposed density appropriate to the location. With regards to design, a number of areas for further consideration are identified in the accompanying Design Review undertaken by Maccreanor Lavington, including consideration of the podium form, height, massing, scale, layout, density and form. The review identifies areas for further work and recommends that further consideration should be given to the overall scale and block structure of the proposed development, introducing a more varied mix of typologies and careful management of edge conditions. In its current form, the design quality could be improved and does not represent the highest quality design achievable.		See above.
Affordable Housing	Additional information required. To note, the viability assessment does not include any S106 contributions in the development costs. Notwithstanding this, it finds that the development is not viable. The Applicant has made an offer for 10% affordable housing as intermediate housing products (shared ownership). The terms of the intermediate housing offer must be clear – including type, equity share and income threshold. The 2016 SHMA states 'Overall the evidence suggests some potential for intermediate forms of affordable housing to contribute towards meeting housing needs in Gravesham, however there are limitations to this potential. With a maximum spend of 30% of household income on housing, 66% of households could afford shared ownership at the 25% equity share level, and 57% of households could afford shared ownership at the 50% and 75% equity share levels. This would leave 34% of households who would still be unable to access housing through a shared ownership product.' The ES notes that 'the size of the Council's waiting list for social housing also indicates a strong need for additional affordable housing supply'. The socioeconomic assessment in the ES is unclear how intermediate housing products would meet the local need for housing or more broadly the socioeconomic needs of Gravesham.		The terms of the intermediate housing will be a matter arrived at through further discussion in relation to S106 obligations. Similarly, a more detailed assessment of how the intermediate housing products would meet the local need for housing or more broadly the socioeconomic needs for Gravesham will be a matter for later reserved matters applications. In the same way that reserved matters will fix the unit mix in response to contemporaneous housing need, the precise format of affordable will be subject to later agreement.
Housing Unit Mix	Advisory comments/ additional information required. The proposed unit mix is heavily skewed towards one-beds (55%), with only 6% 3- bed provision. The Council must consider whether this would be an acceptable unit mix for the scheme and location. If this mix would not be appropriate, the assessments undertaken (ES in particular) must be reconsidered with a unit mix more akin to one that would be acceptable to the Council. This is imperative to ensuring that the full impacts of the development (i.e. child yield, primary school places) etc. have been fully considered in the ES.		As per the submitted Planning Statement, the proposed unit mix is not sought for approval at this stage and is to be fixed via Reserved Matters approval at a later stage. This a reasonable approach for a long-term, multi-phased development so that it is able to come forward in a way that responds directly to housing demands relevant to that time. However, for the purposes of the Application and the ability to undertake a robust assessment of the scheme, a unit mix has been prepared based upon the Illustrative Masterplan, which represents one possible way the scheme could be realized. This is as follows:

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	The 2016 SHMA notes that 'It seems more appropriate that Gravesham Borough Council seeks to follow a similar size distribution in its market housing delivery as is currently evident in all housing stock for the District (approximately 12% 1 bed, 24% 2 bed, 47% 3 bed, 13% 4 bed and 4% 5+ bed), unless information becomes available which would suggest otherwise.' There has been no evidence submitted with the application to support the proposed unit mix. Furthermore, larger unit sizes would derive higher child yields and thus higher infrastructure and play space requirements.		• 4.5% studio; • 50.1% one bed; • 39.5% two bed; and • 5.9% three bed. Notwithstanding the fact that the above unit mix is not fixed, as per the submitted Planning Statement, we are cognisant of Core Strategy Policy CS14, which refers to Housing Type and Size and sets out that "The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities". The Local Plan Core Strategy Partial Review states at paragraph 1.6.14 of Policy CS14 that "Based on current evidence and consultations undertaken so far, what we do know is that more one, two and three-bedroom affordable and market homes are needed in the Borough over the plan period to provide a suitable mix of housing types and sizes that help meet the needs of newly forming households, existing families and older households wishing to downsize". The March 2020 Gravesham Housing & Demographics paper included as part of the evidence base to the Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 – Stage 2) Consultation sets out specific information on the likely population size and household numbers associated with the MHCLG's growth target, including evidence on household type, age profile, pupil yield and the potential size of the labour force. As per the report, through the population forecasting process, an indication of the likely growth in different household types. As per paragraph 4.19, in the 'dwelling-led' outcome, the greatest proportional increase is set to be in the single person (male) household group (+43%), closely followed by one child families (+42%). It is considered that the outline unit mix responds to the above.
Residential Amenity	The accompanying Design Review sets out a number of design components for further consideration to improve the quality of the accommodation. This includes further review of the proposed layout, massing and typologies to improve liveability and quality within dwellings, including daylight and sunlight, wind microclimate, overshadowing and privacy. Furthermore, consideration of noise and vibration will be important as to demonstrate the units would not be affected by existing industrial uses in the area and the anticipated increase in industrial capacity. The Applicant must demonstrate that the agent of change principles have been fully considered and adequate mitigation can be provided to ensure good quality living environments. Consideration of noise will be important as to demonstrate the units would not be affected by the existing industrial uses in the area.		The design presented has been fully considered and adequate mitigation presented within both the EA, DAS and DC. Specifically, details of mitigation are set out at pages 80 – 84 of the submitted DC, which has been updated for clarity. In the updated Design Code (Appendix 6), additional Site Edges page has been added (page 15). Additional text in relation to daylight, sunlight and microclimate has been added to page 76. For agent of change considerations, see Impact on Neighbouring Amenity, below.
Private and Communal Amenity	The accompanying Design Review sets out a number of design and technical components that are likely to affect the quality of the amenity spaces proposed. Notably, the site is subject to complex level changes that limits the ability of connections between the key public amenity areas. Detailed means of connection should be provided at this stage to ensure that a legible and cohesive development and amenity offer is incorporated.		The current parameter plans, DAS and DC illustrate the design intent for site connections that promote a legible and cohesive development and amenity offer. These are illustrated at pages 12 – 14 and 16 of the DAS and in further detail at pages 21, 27, 31, 35 – 37, 50, 58, 59, 66, 111 – 112. The DAS provides balcony design intent to meet a range of situations at page 83. The design provides

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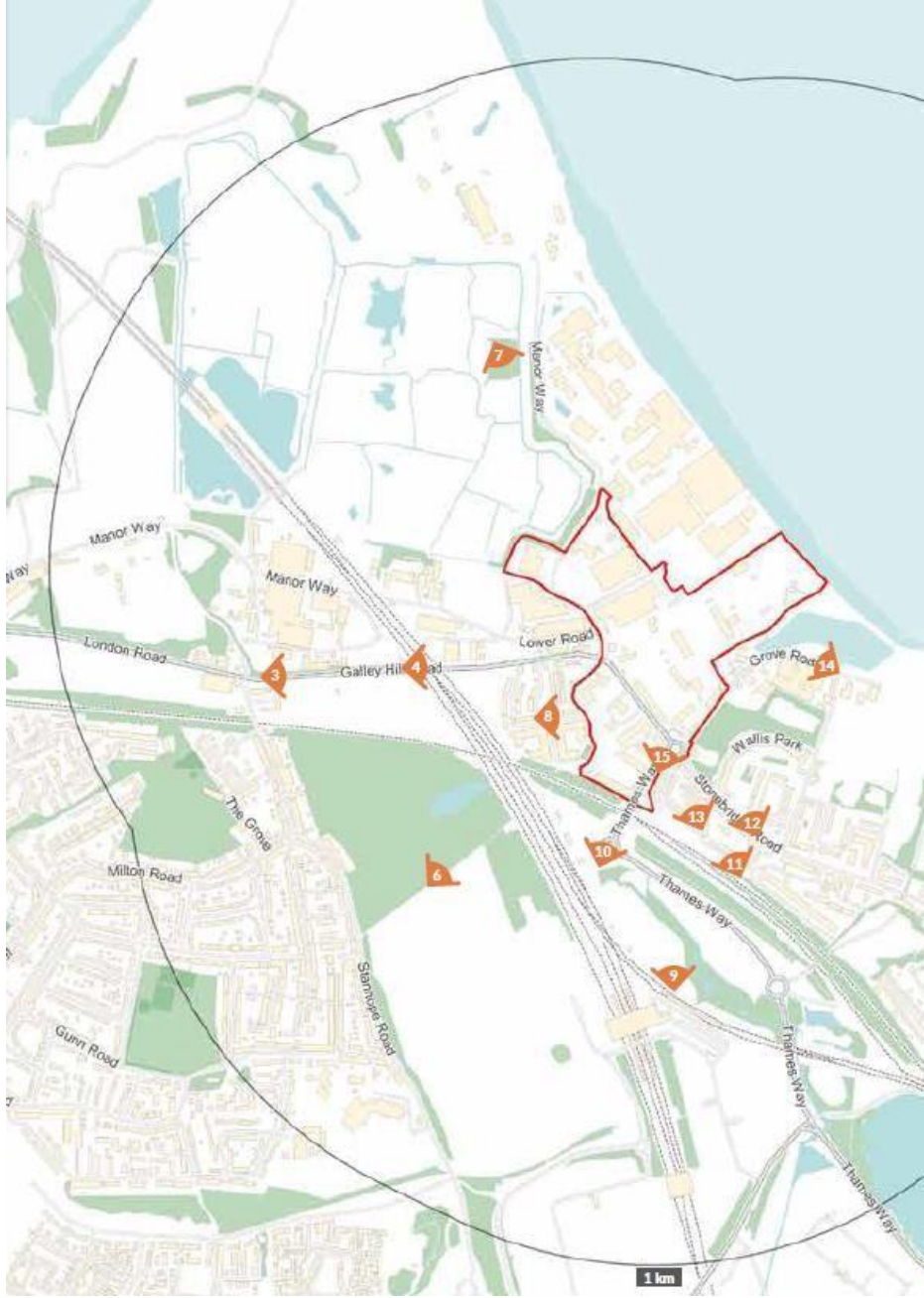
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	The wind microclimate assessment identifies that the provision of balconies may not be possible due to wind conditions. The Applicant does not propose a strategy to mitigate this and/or provide indicative reference to where better/alternative provision of balconies could be sited if mitigation measures cannot alleviate conditions. Additionally, the overshadowing assessment identifies that several semi- private communal spaces meet the BRE test and their locations and/or massing should be reviewed to improve the quality of the spaces. As noted previously, the indicative unit mix currently comprises a 6% provision of 3- bed units, which has impacts upon child yield and play space provision. Should the unit mix be revisited, additional play space may be required to meet the needs of the development.		in excess of the amount of public open space required by policy. The detail of the play space provision is captured at pages 100 – 101 of the Design Code. The type and range of public open space can be adjusted to meet changes in demand that would reflect changes in unit mix. Further details and assessment can be provided accordingly as required at reserved matters stage. Further detail is set out at pages 80 – 84 of the updated DC, appended (Appendix 6). Commentary re. unit mix is provided above. It is noted that a final assessment of playspace can only be set out once a final unit mix is arrived at via Reserved Matters approvals.
	Character and Appearance		
Tall Buildings (incl. Townscape)	Additional information required. The TVIA considers a range of mid to long views. However, shorter range views from the north-west, Wallis Park and Lower Road residential areas may require further consideration.		The view locations in the HTVIA were selected to illustrate the impacts of the scheme in the best possible way, capturing the widest range of receptor groups. View 8 assesses the impacts on the residential communities to the northwest and west, views 11-13 those to the east and southeast. Wallis Park is enclosed by thick existing vegetation which screens much of the Proposed Development. In addition, Lower Road runs along the site boundary and its townscape will be fundamentally altered by the Proposed Development. The proposed condition is shown by the illustrative design imagery included in the Design and Access Statement.

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Design & Appearance	Please refer to the accompanying Design Review prepared by Maccreanor Lavington.		Responses and additional information contained within the accompanying updated Design Code, prepared by HLM (Appendix 6).
Public Realm, Landscaping, Open Space and Play Provision	Advisory comments. The proposed development includes open space that exceeds the Core Strategy requirements. Although a matter for reserved matters stage, it will be important that the spaces are of appropriate form and function. At present, and as identified in the accompanying Design Review, several deficiencies limit the quality of the amenity spaces proposed.		Play provision has been assessed to reflect the current unit mix presented at outline. In the event that an amended unit mix is presented at reserved matters stage, a new assessment will be undertaken. Additional text has been included within the updated Design Code in relation to play provision (page 102) (Appendix 6).

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	In addition, the unit mix is heavily skewed towards one-bedroom units (as noted above). It will be important that the play provision takes account of a unit mix that will be acceptable to the Council, as it will form the basis of an appropriate child yield		See commentary above re. unit mix and playspace.
Heritage			
Heritage Assets	KCC Heritage: comments focus on archaeology Historic England: comments focus on archaeology, noting that there is potential for harm to non designated archaeology, which may be of national importance.	Consideration will also need to be given as to whether the existing wooden stand at the football ground (which dates from 1914) should be treated as a non-designated heritage asset with this included in the planning balance.	Comments received from KCC recommend pre-determination fieldwork, including geophysical survey and geoarchaeological boreholes / test pits combined with trial trenching as well as the production of a Heritage Management Plan. The Applicant has liaised with KCC regarding these comments, and it has been agreed that access to the Site for pre-determination (in respect of the outline application) evaluation is not possible. In reviewing the archaeological work undertaken in association with the Ebbsfleet United Football Club permission (ref. 20150517), it has been determined that geoarchaeological fieldwork was undertaken for 1A and 1B but not completed at assessment stage for 1A nor initial monitoring report or subsequent assessment / analysis for 1B. Nothing was undertaken for Phases 1C or 1D. Consequently, Quest have been commissioned to combine the assessment, analysis and reporting of the geoarchaeological work from both Phase 1A and 1B and provide a single report for the site, updating the deposit model. This will provide better baseline data to Wessex Archaeology to support the Northfleet Harbourside application. This assessment can be provided to discharge an appropriately worded condition. Separate to this, a Draft Heritage Management Plan is to be provided to set out the programme of archaeological work going forwards through the Reserved Matters phases – this will be a live document that can be updated as surveys are completed to inform later stages of mitigation. KCC have included some recommendations for draft conditions within their response, which the Applicant agrees are appropriate to apply to any forthcoming outline planning consent, given that require the submission and approval of further assessment work prior to development works or the submission of any reserved matters. We note that the Committee Report associated with the Albion Waterside application references conditions related to Archaeology and Building Recording, including "Archaeological field evaluation of undesignated archaeological remains and measures to ensure preservation – pre-commencement requirement". A similar condition is considered appropriate in respect of Northfleet Harbourside. With regard to the Council's comment re. the existing wooden stand at the football ground, we note that this for the Council to consider in the planning balance.
Townscape	Additional information required. The TVIA considers a range of mid to long views. However, shorter range views from the north-west, Wallis Park and Lower Road residential areas may require further consideration.		See commentary re. tall buildings (townscape), above. Separate commentary has been provided to GBC in respect of the cumulative schemes.

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	 Additionally, the visualisations demonstrate significant impacts in a number of views, particularly open road views (views 4 and 15) and from riverside park (view 1).The TVIA relies on the detailed appearance and architectural expression of the buildings (which is to be developed at reserved matters stage) to conclude that the impact would be beneficial. Whilst this may be the case, GBC must determine whether: 1) They agree with the conclusions of the TVIA and that the impact of the completed development would be beneficial in the tested views; 2) Ensure that they consider the design code secures the delivery of high quality design that responds to the context and would be appropriate in the context of		

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	the mid and longer range views. To note, the accompanying design review identifies a series of further considerations to ensure quality design. We would also note that the cumulative schemes considered are not fully representative and AVRs should be reproduced following agreement of cumulative schemes with GBC. Particular regard should be given to the emerging skyline.		
Archaeology	Additional information required/ policy conflict. The Archaeology DBA notes that field investigations have not been undertaken due to time constraints. HE and KCC Heritage consider the development has the potential to harm non-designated archaeological assets and both have recommended further field investigation is required to inform the extent, condition and significance of assets on the site. HE consider that there is insufficient information to understand and assess the impacts of the development – a view echoed by KCC Heritage, who consider there to have been little investigation of the site to date. From HE's perspective, additional fieldwork must include deep penetrating geophysics, boreholes, test pits, and additional testing of the Botany Pit and peat deposits. All to be carried out prior to determination of the application. KCC Heritage have also requested further field work, although they note this could be secured by condition if not possible prior to determination. In the first instance, KCC have recommended refined character areas with appropriate research questions are developed and then subject to field evaluation. Field evaluation to include geophysical survey, geo-archaeological boreholes and test pits with trial trenching across the site. Additionally, field evaluation is required to understand the exact depth and extent of the historic quarrying. It will be for GBC's consideration whether further field work is secured by condition and/or required for submission prior to determination. HE also note that clarification is required on the capacity of the parameter plans to be amended to respond to the findings of historic environment evaluations. The parameter plans should respond to possible locations of archaeological remains. The Applicant contends that the viability of the site is dependent on the quantum of development proposed and it is therefore necessary to understand the impact of lower site coverage (due to archaeological constraints) on viability of the proposals.		See Heritage, above.
	Transport		
Re-location of A226 Stonebridge Road	Additional information required. The Council may wish to consider a preliminary or outline CMS for the A226 works to address GBC Highways comments. The strategy may need to consider the utilities that run below the A226 and the technicalities of stopping up and diverting the route. It has not been demonstrated that the diversion works required could be supported. Noting that the location of the infrastructure must be ascertained on site, the applicant may be able to undertake overground survey prior to determination to locate the infrastructure. However, it may be more likely that the exact location cannot be confirmed until excavation work/ pits have been dug. This is a matter for the Applicant to consider and demonstrate the concerns/ diversion can be addressed, especially to the specification required by Southern Water (max 400 metre diversion without a loss to hydraulic capacity). Note: KCC model results pending.	The road layout currently proposed does not make adequate provision for a bus service to link to Grove Road from the proposed development. It's difficult to see how a road to serve Britannia and other companies beyond Britannia could fit between the electricity pylon and Seacon's existing structures. The plans as they currently stand also remove parking for Britannia Refined Metals Ltd employees and visitors, as well as HGV parking, this needs to be addressed. How [would] the new highway layout...perform when there are incidents on the A2 and/or Dartford Crossing because flows transfer to the A226 and other local road? Development if permitted could potentially be built out at the same time as Ebbsfleet Central and the Lower Thames Crossing and the implications of this need to be understood.	The Transport Assessment Addendum prepared by Vectos (Appendix 7) considers the points raised by GBC and provides responses. In terms of the road between the electricity pylon and Seacon's existing structures, this could if required be kinked should space be an issue. In terms of parking for Britannia, a strategy can be arrived at as part of reserved matters. The proposed realignment of the A226 has been designed in consideration of the need to maintain a suitable haulage route which is frequently used by HGVs. The geometry of the proposed route allows for the continuation of this link between Dartford and Gravesham with traffic controls implemented to manage demand. Modelling has been completed for the route both as part of the KCC strategic model, and on a stand-alone junction basis to ensure sufficient capacity is secured for the route. Consideration of construction methods will be developed as part of the relevant Reserved Matters application for the realignment.

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		For example, would it be possible to provide an indication of what temporary arrangements could be put in place to divert the A226 and local highway links during construction?	Furthermore, due to the outline nature of the application, no detailed assessment of utilities locations has been completed, though this is something that will be addressed at the appropriate time.
Access	Note: KCC model results pending.	Little on access points from that network into parking or servicing areas from the future highway network other than what is shown at section 2.0 of the Design Code. However, would not the access to the 01 Marketplace parking area also require some form of junction arrangement and possibly signalised control onto the A226 in tunnel?	Modelling has since been completed through the use of the KCC strategic model to allow the proposed highway alterations to be assessed from a capacity and safety point of view. This has been completed for both weekday and Saturday periods. As part of this assessment, all relevant and appropriate committed developments have been accounted for with traffic flows extracted directly from the KTM model to ensure this is the case. This also incorporates an alternative distribution model inbuilt to the KTM model. To align with the establish KTM model, output years of 2030 have been completed based on the forecast construction period contained within the application. The results demonstrate that all junctions will operate within capacity prior to and when the development is completed. This information is included within the Transport Assessment Addendum (Appendix 7). Further detail on access points can be provided as part of reserved matters applications.
Trips & Impacts	Note: KCC model results pending.	Consideration should also be given to the current closure of Galley Hill Road and potential impacts on the construction and operational phases of the proposed development, should the closure continue for a prolonged period.	A significantly revised and comprehensive trip generation exercise has been completed to review the comments from both KCC and National Highways. This includes supporting evidence for internalisation and linked trips. This exercise is detailed within the Transport Assessment Addendum (Appendix 7). Consideration to the current closure of Galley Hill Road is set out at paragraph 4.8 of the CTMP.
Parking	Advisory comments. S106 contributions have not been included in the viability assessment. GBC Parking's requirements must be clear and comments will need to be reviewed in due course with regard for other requirements of GBC Highways, KCC Highways (who are yet to comment) and National Highways.	Would the level of parking be adequate to serve the number of studios and one bedroom units? It is unclear how residential parking spaces would be distributed around the development relative to the residential unit types. Adequacy of electric vehicle charging for both residents, businesses and visitors will need to be considered in due course and any electric supply capacity issues that might arise. Car Parking Management Plan (CPMP) which states that car parking will be restricted along internal roads... However, it is not clear at this stage what internal roads will fall under the management company's jurisdiction and what roads will fall under the local highway authority/borough council in terms of enforcement.	Discussions have been held with KCC regarding the potential implementation of wider parking restrictions in the area with s106 contributions mooted. Parking provisions are low deliberately due to the sustainable nature of the proposals and the location of the site. Significant sustainable infrastructure is proposed to discourage the use of private cars for transport. It is also necessary to refer back to commentary set out above in respect of unit mix, and this being fixed at reserved matters stage. On this basis, car parking provision also stands to be fixed at reserved matters stage. This applies to the overall quantum, split and spatial provision of car parking, as well as the provision of EV charging. A framework CPMP has been developed with further detail and clarity to be provided through each Reserved Matters applications as appropriate, with the client committed to delivering this.

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Walking, Cycling and Public Transport	The accompanying Design Review sets out additional considerations relating to access and connectivity and public realm. It identifies the need to embed pedestrian and cycle routes into the parameter plans, provide clarity on how servicing needs will be met and consideration of the impact of hammerhead/turning circles on the quality of the public realm. Additionally, further consideration is required in relation to the connectivity between public open spaces, clarity on inactive frontages and further consideration of site levels to ensure the delivery of a cohesive and accessible public realm.	A section of Lower Road outside of the red line is shown as remaining. In its present form this would create a poor environment and act as a barrier to the cycling and pedestrian links being provided towards Swanscombe Peninsula. Clarity also needs to be provided on how the indicative cycle link outside of the red line will be delivered. Further consideration also needs to be given to improving both pedestrian and cycling links to Ebbsfleet Railway Station, Northfleet Railway Station, Northfleet High Street / The Hill. Indicative routes shown at present would be inadequate. Thought needs to be given to off-site improvements to the cycling network and increased cycle parking provision at key destinations.	This is already outlined in the parameter plans. Only hammerhead/turning circles will be at the residential units/in the stadium servicing area. Within reserved matters applications the layout of access routes and turning circles would be designed to ensure that they can accommodate the vehicles forecast to service the site. As such, the impact of such manoeuvres on the public realm will be determined through subsequent Reserved Matters applications. In any case a shared surface would be implemented where possible to help to create a more pedestrian-led environment at the site. This information is outlined within Section 4 of the TAA, at paragraph 4.68. Reference to the routes between open spaces are outlined within Figure 4.4 of the TAA. Consideration of the different levels across the site and the subsequent design of pedestrian routes to accommodate pedestrians from all walks of life is outlined within Section 4 of the TAA, at paragraph 4.46. In respect of design, page 14 of the updated Design Code includes additional text in relation to walking, cycling and public transport. The podiums have been designed to be wrapped in active uses and residential front doors. The maximum dimension of inactive frontages has been defined as 25m. The Transport Assessment Addendum (Appendix 7) responds to queries raised in regard to off site cycle and walking routes.
Waterborne Transport		Thought should be given to the potential to promote and use waterborne transport during both the construction and operational phases.	As per the Transport Assessment Addendum (Appendix 7), the use of the river within the construction phases of the development is discussed at Paragraph 5.19 of the CTMP.
Environment			
Impact on Neighbouring Amenity	Advisory comments / additional information required. It must be ensured that the new sensitive use (residential) does not prejudice existing noise generating activities. The ES chapter noise and vibration includes consideration of the need to protect the residential units against existing industrial uses in the area. However, the baseline conditions only include existing conditions and assume no changes in their operation. This would run in conflict with the expansion and growth plans noted by Port of Impa and general business ambitions to expand. It may also restrict industrial capacity and prohibit intensified activity in conflict with the agent of change principles – the development should not preclude development/expansion opportunities for existing uses. The Council must consider whether an assessment of higher noise levels is required, particularly at night time hours, to account for more boat movements along the Thames, HGV movements along the re-routed A226 and/or plant activity at night time and the continued, and perhaps enhanced, economic function of the surroundings. The Council may seek to ask the applicant to locate water infrastructure assets and demonstrate that windows would be situated more than 15 metres from those boundaries.		Paragraph 187 of the NPPF states that “Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed”. Policy CS03 sets out at paragraph 4.4.29 that “Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, transport and access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line”. Policy DM8 sets out that “Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed”.

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			KCC's Safeguarding SPD refers to Assessing Impacts on Existing Infrastructure (proposals within 250m), noting that the applicant should demonstrate, with any necessary clarifying input from the site operator, that: - Impacts that may legitimately arise from the activities taking place at the safeguarded facilities (e.g. noise, dust, light, air emissions and odour) would not be experienced to an unacceptable level by occupants of the proposed development (and potentially also lead to constraints being imposed on the safeguarded facility in the future); and - Mitigation measures have been considered where necessary, for example through the design (e.g. noise insulation) and orientation of the proposed buildings, to minimise disruption to the users of the development; - And vehicle access to and from the safeguarded facility would not be constrained by the development proposed. The Port of Tilbury lies approximately 750 m from the site of the Proposed Development on the other side of the River Thames and as such would not be considered a relevant safeguarded facility or piece of existing infrastructure for the purposes of Policy DM8 and the KCC Safeguarding SPD, as above. Notwithstanding this, specific reference to the Port of Tilbury is set out within ES Volume 1, Chapter 3: Alternatives and Design Evolution. The surrounding industrial uses have been a key consideration in the design of the Proposed Development, with full assessments of the potential impacts upon noise and vibration and air quality being assessed in ES Volume 1, Chapter 8: Air Quality and ES Volume 1, Chapter 9: Noise and Vibration. An assessment of shipping emissions on the Proposed Development concluded that, due to the ships being downward of the Proposed Development and the Seacon Terminals being only a small operation, there would be no concerns in terms of exposure of future residents of the Proposed Development to shipping emissions. In terms of an increase in operations associated with the Port, at this time we cannot pre-emptively consider any increase as there are no details available. Defra's LAQM TG.22 guidance states that further assessment is required where there are 5,000 annual large ship movements within 250m of the exposure, or 15,000 annual movements within 1km, so any future increases in activity at the Port of Tilbury would need to consider these criteria. The Noise and Vibration ES Chapter (ES Volume 1, Chapter 9: Noise and Vibration) undertook the following: - Long term environmental noise monitoring; and - A review of existing planning conditions relating to noise emissions from Tilbury Dock. In order to provide a reasonable worst-case scenario, the noise and vibration assessment considered the noise impact from dredging (a quarterly activity associated with the dock) and applied a 3 dB increase to future industrial noise to account for potential growth. In addition to this, a +12 dB was incorporated to include acoustic

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			features in the assessment of noise impact on the Proposed Development. The assessment indicated that the plots overlooking the Thames and Port of Tilbury would likely experience a "High" impact due to industrial noise and night time Dredger noise from the dock. These locations would need to incorporate specific acoustic design measures to reduce external noise intrusion sufficiently for residential uses. The indicative façade sound insulation requirements are outlined in ES Volume 1, Chapter 9: Noise and Vibration as well as potential glazing specifications (Table 9.37 of ES Volume 1, Chapter 9: Noise and Vibration). The precise measures to be adopted will need to be confirmed for each plot during their RMA. The assessments indicate that intermittent high noise levels associated with the Port of Tilbury (ie dredging) can be satisfactorily addressed through design measures. By addressing the noise from this activity will ensure that other less noisy activity will also be appropriately accounted.
Noise and Vibration	Advisory comments/ additional information required. It must be ensured that the new sensitive use (residential) does not prejudice existing noise generating activities. The ES chapter noise and vibration includes consideration of the need to protect the residential units against existing industrial uses in the area. However, the baseline conditions only include existing conditions and assume no changes in their operation. This would run in conflict with the expansion and growth plans noted by Port of Tilbury and general business ambitions to expand. It may also restrict industrial capacity and prohibit intensified activity in conflict with the agent of change principles – the development should not preclude development/expansion opportunities for existing uses. The Council must consider whether an assessment of higher noise levels is required, particularly at nighttime hours, to account for more boat movements along the Thames, HGV movements along the re- routed A226 and/or plant activity at night time and the continued, and perhaps enhanced, economic function of the surroundings.	Given the proposal relies on the stadium being multifunctional, it is suggested that this needs to be better understood so that impacts can be assessed on a reasonable worst-case basis.	See commentary re. agent of change above.
Air Quality	Advisory comments. To note, the air quality modelling is based on traffic data. There is a possibility that this may require review once KCC have re- run the traffic modelling and/or there are any significant changes to predicted traffic flows. Additionally, should GBC be minded to grant outline consent, we would recommended a condition for a detailed air quality assessment and mitigation measures (as necessary) is included.	Given part of the proposal effectively places in the A226 in tunnel under the development have the implications of this been taken into consideration and how any fumes (or smoke in the event of a fire) would be dispersed? Presumably the design would need to accommodate ventilation arrangements to deal with this, including room for associated plant. Sufficient details should be provided to allow the LPA to consider the impact of such structures and plant upon air quality and noise.	The Applicant is willing to accept an appropriately worded condition in respect of air quality monitoring and mitigation.
Contaminated Land	Advisory comments. The current industrial use and potentially contaminative land uses could pose a risk to proposed residential occupiers. As such, should GBC be minded to grant outline consent, a condition for thorough site investigation, contaminated land remediation and verification should be applied to all phases.		The Applicant is willing to agree to a condition relating to site investigation, contaminated land remediation and verification being applied to all future phases of development.
Daylight and Sunlight	Advisory comments.		A separate response has been issued to GBC in respect of cumulative schemes.

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	Noting the gaps present in the cumulative schemes list considered in the EIA, there may be a need to repeat the daylight, sunlight and overshadowing assessment with regard for a full cumulative schemes list as agreed with GBC. Additionally, Chapter 10 of the ES identifies daylight impacts to a total of 19 buildings. The impact is quantified as minor adverse and negligible in most instances, and minor to moderate adverse in one instance. GBC must have regard for these impacts in their decision making balance and determine whether the harm to residential amenity and/or any other adverse impacts identified are outweighed by the benefits of the scheme. A detailed daylight, sunlight, overshadowing, solar glare and light intrusion assessment should be secured by condition for each phase of development should GBC be minded to grant outline consent.		The Applicant is willing to agree to a condition requiring detailed daylight, sunlight, overshadowing, solar glare and light intrusion assessment in association with each phase of the development.
Wind Microclimate	Advisory comments/ additional information required. Detailed wind microclimate testing should be secured by condition for each phase of the development should GBC be minded to grant outline consent. Notwithstanding the above, the current testing shows that some of the private amenity areas would be unsuitable from a wind microclimate perspective. Whilst this can be refined at reserved matters stage, the strategy to address this must be included in the design code to ensure that the placement of balconies is appropriate to the appearance of the building and wider development whilst also delivering high quality and functional amenity spaces. The testing currently shows that the Power Park does not provide any areas suitable for sitting in the summer and only little space for standing in the windiest seasons. Additional mitigation should be considered for this key open space to ensure it provides opportunities for dwell and play. Additionally, mitigation measures must be introduced to key dwell spaces, such as Riverwalk Gardens, The Market Place and The Boulevard to ensure the delivery of a quality public realm.		The Applicant is willing to agree to a condition requiring wind microclimate assessment in association with each phase of the development. Façade design solutions to mitigate microclimate and site constraints are referenced at pages 84 – 85 of the submitted updated Design Code.
Biodiversity and Ecology	Additional information required/ policy conflict. The breeding birds survey should be carried out in seasons, in the months of April, May and/or June. It is possible that a larger number of birds utilise the site than that recorded in the breeding birds survey undertaking, noting that it was prior to the optimal season. The results of the wintering birds survey must be submitted as soon as possible. Natural England note that the ES for London Resort indicated that, given the number of birds associated with the SPA and Ramsar site, the area was functionally linked to the SPA and Ramsar site - and mitigation was required and have stated that two years of wintering birds surveys are required. If the wintering birds survey shows species associated with the SPA and Ramsar - the ES will need to be updated & provide nature and scale of impact, mitigation measures, and sufficient information for the Council to undertake a Habitats Regulations Assessment. Further information is required on the assessment of mudflats and habitats. Chapter 10 of the ES identifies negligible to minor adverse impacts to Swanscombe Peninsula SSSI in terms of light intrusion providing that mitigation is built into the design. However, little detail on the mitigation is provided within the submission documentation. The approach to artificial light near the SSSI will likely need further consideration prior to determination, to ensure that the ecological impacts of the development have been accurately assessed. As a minimum, it would be beneficial for principles of design to be agreed as part of the design code.		A standalone response has been prepared by Trium / Schofield Lothian and is appended (Appendix 8). This response includes a Wintering Bird Survey Report and Shadow Habitat Regulations Assessment.

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	New dwellings are proposed within the zone of influence of the Thames Estuary and Marshes, Medway Estuary and Marshes and the Swale Special Protection Areas (SPAs) and Wetlands of International Importance under the Ramsar Convention. The Council may wish to seek further evidence that the proposals will adhere to the agreed approach within the Estuaries Strategic Access Management and Monitoring Strategy to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation first before occupation. As noted by RSPB, the paths on site are designed to lead directly onto the SSSI and the subsequent recreational pressures must be considered. England Coast Path – the principle of the Coast path is to keep the train as close to the coast and estuary as possible, and this should be followed with any realignment. Details of how the trail will be kept open as a continuous route during the development phase should be provided. Chapter 10 of the ES identifies some minor adverse impacts to Swanscombe SSSI, River Thames and Robins Creek in terms of transient overshadowing. Chapter 14 of the ES concludes that the harm would not be significant in any of these instances. However, noting the quality of the ecological receptors and the habitats they are likely to contain, further investigation should be undertaken to ascertain habitats that exist in affected areas and the impacts that could arise. This should seek to quantify the harm to biodiversity and ecology arising from the development. As required by part a of paragraph 180 of the NPPF, consideration must be given to alternative layouts/sites. If further investigation reveals that there would be harm to ecology and biodiversity, consideration should first be placed on amending the parameter plans to mitigate the harm. Chapter 14 of the ES goes on to conclude that the cumulative effects are considered to be moderate adverse on ecological and biodiversity receptors, and that following the implementation of mitigation and monitoring measures, no likely significant effects would arise as a result of the proposed development. The Design Code provides insufficient detail on the mitigation measures to substantiate the conclusions and there is little consideration of the types of habitats lost and re- provision for these.		
Flooding and Drainage	Additional information required / policy conflict. The development has not demonstrated that it passes the exception test – that it would be safe for its lifetime without increasing flood risk elsewhere – as required by the NPPF. The development has a 100-year design life. Accordingly, it should be demonstrated that the site's flood defences will provide the required degree of protection for the design life. The Thames Estuary 2100 Plan sets out the required flood defence crest level to maintain a sufficient standard of protection whilst account for climate changes must be raised 8 metres AOD by 2070. Accordingly, this must therefore feature in the development to demonstrate a flood defence with a design life of 100 years. This would require either a new flood defence is constructed or that the existing can be raised 8 metres AOD and provide the required degree of protection. Any proposal including the existing river wall would have to demonstrate sufficient residual design life through extensive series or surveys and testing. This is not addressed in the submitted documents. Whilst it is noted that the Applicant intends to provide flood defences in the 19 metre set back between the site boundary and existing flood defence walls, inadequate detail has been provided at this time with regard to strategy and/or the subsequent impacts elsewhere. Further evidence to support the principle of diverting the culvert is required. Noting that part of the buildings will lie directly over the culvert, the parameter plans the consent	It is also understood that the red line boundary has been drawn to exclude the existing flood defences but that a landward margin of 19 metres has been included within which an improved defence consistent with Thames Estuary 2100 objectives could be constructed. Whilst the applicant has indicated a commitment to provide a new defence within this margin, it is not clear when or how this would be delivered or by whom. Also, if the existing flood defence is excluded from within the red line boundary (it being irrelevant whether the applicant owns them or not provided notice is served) any planning permission would not apply to any necessary works to either remove them or to tie in the proposed new defence. This may also have implications for any s.106 agreement given any planning obligation related to upgrading of the defences would need to be linked to the permission with the owner of the defences being a signatory. This may also have implications for any CPO (if required) given the defences lie beyond the red line boundary.	Further information was issued by the Applicant team to the EA in Feb 2023 and a meeting was held in June 2023. In summary: - A new 8m AOD flood wall is proposed to sit behind the existing flood wall. Specifically, Option 2 of the Alternate Retaining Wall Conditions document. This was sent to the EA in Feb 2023. The EA commented on 7 March 2023 that "We are pleased to see that the development will include tidal flood defences raised to no less than 8.00m AOD as required by the Thames Estuary 2100 Plan...we require further information to demonstrate buildability...Please provide an initial design for the flood defences". In response, the Applicant team presented a River Wall Impact Assessment detailing an intertidal terrace to sit below the Mean High Water Springs levels with further detail to be determined at the detailed design stage. - The Applicant team confirmed in Feb 2023 that proposal includes 16 - 19m easement free from built development allowing for future upgrades and maintenance of flood wall.

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	would be tied to, and the intrinsic link between the viability of the scheme and the quantum of development required, evidence that the culvert can be diverted without increasing flood risk elsewhere should be provided prior to determination. The EA consider that building over the culvert would limit the climate resilience of the site the current condition of the culvert is not accurately known. The EA may support redirecting of the channel, but only in instances where existing structures prevent daylighting. Furthermore, existing surveys of the most landward extent of the asset and easement values have not been considered, nor that the parts of the culvert that may need to remain in situ have a residual design life of 100 years. EA further advised that "The proposal should not build out over the existing culvert line but daylight where possible. Ideally the whole length of the culvert or certainly a longer section across the site could be daylighted". The EA have requested a site specific flood risk model to be submitted despite having carried out catchment level modelling of the main river Ebbsfleet in 2015. It considers that the findings of the existing model – a very low level of flood risk to the site – are inaccurate and should not be used as the only assessment for fluvial flooding. GBC must determine whether this further modelling is required.	The Environment Agency have provided substantive comments on flood risk (as well as other matters), and it is vital that these matters are addressed adequately.	- In respect of deculverting, a revised proposal has been arrived at. The details of this are set out in the attached and on page 105 of the submitted updated Design Code. - The flood modelling is currently being undertaken including the baseline scenarios, daylighting scenarios and scenarios accounting for the potential managed realignment of defences in Robins Creek. The mitigation in the FRA report and the flood modelling results will help demonstrate that the development will be safe for the operational lifetime of the development. The River Wall Impact Assessment details options to upgrade the flood defences to a crest level of 8.0 mAOD by 2070 and to provide a standard of protection for the lifetime of the development. This also details the set back from the flood defences alongside the proposed layout plan. During a meeting with the EA, the set back from the defences was discussed including that the defence would be cantilevered and it would be maintained from the riverside of the defence. Following this discussion, the EA had no further comments on the set back from the defences. An indicative layout plan has been designed to daylight the channel along the majority of the eastern boundary and the easements from this asset and, therefore, diverting the culvert is no longer considered. The daylighting includes moving the buildings in the east to provide space for daylighting the culvert. The details of the deculverting is subject to the flood modelling results which will indicate that the proposed works will not increase flood risk within the site or elsewhere. This was discussed with the EA during the June meeting. A minimum easement of 3.5 m from the top of the banks of the watercourse to the buildings would be provided in line with EA's suggestion during the meeting that 'the maintenance buffer of 8 m could be reduced if the river is daylighted'. The maintenance access will be greater adjacent to the road and, therefore, the River Ebbsfleet can be maintained from this side. Additionally, sections of the proposed built form will comprise of a public walkway at ground level which will provide an increased easement from the watercourse in these areas and will be open across two levels. The applicant has worked alongside London Drainage Facility to investigate surveying the culvert. Following multiple site visits and attempts, it was deemed unsafe to access the culvert due to the considerably high water levels meaning that the survey equipment would become submerged and information unable to be obtained. The applicant explored a number of options and looked into getting a 'walk through' survey undertaken in order to gain survey information. however, it was determined that this would require a full rescue team, breathing apparatus and confined space equipment including gas monitors and radios. After much consideration, this option would result in exorbitant requirements for 'pre-planning' survey work and the applicant was unable to commit to this type of assessment at this stage of planning. The fall-back position was therefore to undertake an above ground topographical survey of the area

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			surrounding the culvert and, where possible, to lift manholes and measure the depth of the culvert at points where access was possible. Flood modelling is currently being undertaken and will be issued when it has been completed. This will include the data provided from the survey of the culvert and will include the new daylighting scenario, the potential managed realignment of defences along Robins Creek and the climate change scenarios for the site. The more vulnerable land uses will be located on the first floor or above to ensure that they are located above the design breach flood levels. Although some of the more vulnerable land uses are located below the design flood level, these will include entrances and service rooms for the more vulnerable land uses above. The proposed entrances will not include waiting rooms and all of the 'more vulnerable' land uses at the ground floor will have access to internal staircases which lead to the second floor (i.e. above the design flood level). All of the above information is contained within the RMA Response Letter to the EA (Appendix 9).
	Energy		
Energy & Sustainability	Additional information required. A clear energy strategy for the Site has not been set out. It is unclear what the power source for the Site. Whilst consideration has been given to a decentralised energy centre, this is a matter yet to be explored and it has not been demonstrated that it would be feasible. Furthermore, it would need to be provided within the first stages of development should a single centralised site-wide system or site-wide DHN is employed. The energy need should inform the ideal phasing of development to ensure adequate infrastructure delivery. Whilst PV and air source heat pumps have been confirmed for consideration there is are no indicative figures provided for their expected output. The framework sustainability and energy statement does not establish principles for the site; it simply sets out a number of principles that could be considered for the site rather than an overriding strategic approach to energy across the site. Given the scale of the development and the possible implications in terms of carbon output, the strategy is likely to have impacts upon the ES and further information, including a clearly defined energy strategy, should be provided. The energy strategy does not refer to the layout, building orientation, massing and/or landscaping of the proposals and it is unclear whether the parameter plans have been guided by a need to minimise energy consumption. Noting that these plans will guide the detailed design for each phase, it is recommended that further information is sought to demonstrate how the parameter plans directly respond to these matters.		In order to undertake modelling, information beyond that which is currently available would be required in respect of the proposed buildings and uses. As part of the reserved matters applications, each building will be modelled in detail to demonstrate the CO2 savings and the Applicant would welcome appropriate conditions to demonstrate savings at this point. The submitted Energy Statement includes a commitment to set design parameters that follow LETI guidance. This guidance was developed to ensure that new buildings would achieve exemplary energy performance and ensure that the UK would meet its 2050 Net Zero commitment by reducing demand on the electrical grid and enable it to use renewables and decarbonise. The buildings, as well as achieving four credits under Wat01 through the selection of efficient sanitaryware and potential rain / greywater harvesting technologies being adopted on the scheme. Robust low and zero carbon technologies including air source heat pumps and solar photovoltaics have been selected for the site and district energy experts Vital Expert were involved in the development proposals. Utilising these technologies on the development will allow the applicant to put forward a sustainable energy strategy, backed by proven strategies, built on robust principles. Further sustainability statement text has been added to the submitted updated Design Code and page 8.
Overheating & Cooling	Additional information required. It appears that overheating and cooling has not been considered. It is unclear if the parameter plans have been designed with consideration of overheating/ solar glare to minimise the need for artificial cooling.		Please see comments under 'Energy & Sustainability', above.
Whole Life Carbon	This is considered within the Framework Energy & Sustainability Statement. However, rather than establishing principles that will be adhered to, strategies for further consideration are outlined. The framework goes on to note that the energy and embodied carbon targets will be defined at the start of the design for each phase. This		Please see comments under 'Energy & Sustainability', above.

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	should be secured by condition, including the requirement for a detailed pre-demolition audit.		
Circular Economy	This is considered within the Energy & Sustainability Statement. However, the framework is descriptive and notes the circular economy principles will be utilised. Given the age and nature of use of the buildings within the site, due consideration should be given to asbestos and implications for construction waste/ re-use. A detailed circular economy statement and pre-demolition audit should be secured by condition for each phase of the development.		Please see comments under 'Energy & Sustainability', above.
	S106		
	Advisory comments. Whilst the viability appraisal does not include an allowance for S106 contributions, it concludes that the proposed development would not be viable. It is therefore unclear how the affordable housing would be deliverable with additional costs of mitigation required to make the scheme acceptable in planning terms. We also draw attention to the accompanying Financial Viability Review, which concludes that the scheme is not considered to be viable even without the significant abnormal costs associated with the proposals, including (but not limited to) re-alignment of the A226, contaminated land remediation, archaeological investigations, land assembly, diverting the culvert and/or channel, re-provision of the football club and enabling works. Noting the flat rates for a number of contributions set out in the GBC's S106 SPD, the total contributions should be calculated for the scheme and included in further viability testing. As noted previously, the unit mix includes a low (6%) proportion of 3-bed units. This is likely to affect child yield and subsequently the number of school places the proposals would seek to demand. GBC must determine whether the unit mix is appropriate to the location and needs of the borough to ensure that the needs can be met by existing capacity. Alternatively, and as noted in the SPD, it may be necessary for additional education provision to be brought forward as part of the proposals or sufficient S106 contributions to fund expansion/school places to accommodate the needs of the proposals. Equally, it may be possible to negotiate the contributions for community uses if GBC consider the community floorspace provision to be above the needs of the development and such that it could service surplus demand in the area. This should be viewed in the context of securing adequate terms for usage of the community space and ensuring early delivery of these spaces.		The submitted FVA included undertaking a sensitivity analysis of the proposed scheme with the inclusion of 10% affordable housing (350 x intermediate homes) and concluded that the proposals with 10% affordable housing would remain both profitable and deliverable, albeit at margins that we consider to be sub-market. Our submitted assessment did not include an allowance to cover other S.106 contributions. These costs are still unknown at this stage and are also unlikely to be significant and therefore it is unlikely to alter our viability conclusion. We can of course include an appropriate allowance for this when further information becomes available. Responses to commentary regarding the proposed unit mix are set out above. In respect of viability considerations, we note the low proportion of 3-bedroom homes. We would note that increasing the quantum of larger sized homes is likely to worsen the viability of the proposed scheme.