



Application: 20230639
Your Reference: EDC/22/0058

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

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

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

at **Land East Of College Road**
Northfleet Embankment West
The Shore
Northfleet
Gravesend
Kent
DA11 9AN

and being **EDC Reconsultation - Reserved matters application (access, layout, scale, appearance and landscaping)** pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land east of College Road (Phase 2) comprising the erection of 130no. dwellings together with associated infrastructure including details relating to finished floor and site levels, noise attenuation measures, ecological mitigation and enhancement strategy and schedule of public open spaces (condition 9), renewable energy, water conservation and carbon reduction technologies (condition 11), design and maintenance of the public realm and other areas with a public amenity function, provision of and timetable for installation of public art and heritage interpretation (condition 15) and scheme for the re-interpretation of the College Road flint wall (condition 40(ii)).

Referred to in your application dated 14 June 2023.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

The Ebbsfleet Development Corporation (EDC) is advised that the Borough Council has been previously consulted on application EDC/21/0058 in relation to the details relating to finished floor and site levels, noise attenuation measures, ecological mitigation and enhancement strategy and schedule of public open spaces (condition 9), renewable energy, water conservation and carbon reduction technologies (condition 11), design and maintenance of the public realm and other areas with a public amenity function, provision of and timetable for installation of public art and heritage interpretation (condition 15) of that planning permission (GBC ref 20220529) and comments were sent to the EDC on 08 June 2022 and additional comments sent 04 October 2022.

Further re-consultation was carried out (GBC ref 20221120) and comments were sent to the EDC on 08 December 2022.

It is not intended to repeat those previous consultation comments, however in respect of the revised documents the subject of this further consultation the EDC is advised that in response to internal consultation it has received the following responses:

GBC Housing Development

I can confirm agreement to the Revised Tenure Strategy dated 18th April 2023 setting out the sizes, tenure and location of the affordable housing in this phase of the development.

I also note the sizes of the affordable housing units in the Revised Phase 2 Housing Schedule dated 18th April 2023 which includes the sizes of the affordable units.

GBC - Highways Officer

It is disappointing that the applicant wishes to maintain the roads as private. This places additional financial burdens on the residents and causes confusion over responsibilities for various activities, such as maintenance and car parking enforcement.

It should be noted that even if the developer does not have or intend to the road adopted initially. There are mechanisms available which may permit adoption, although this can be a costly and time consuming process.

https://assrity'ets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095577/advice-note-highways-adoption.pdf

It is therefore beneficial to all concerned that the road is built to adoptable standards and for the developer to have Kent County Council, check the design and inspect the construction to ensure compliance with the Highway Authority's requirements.

The proposals for visitor parking appears to be totally inadequate at 7 spaces, Interim Guidance Note 3 of the Kent Design Guide suggests that there should be one parking space for every 5 dwellings or 20% of the total dwellings which here equates to 26 spaces a considerable increase on the provision, which could result in inappropriate parking within the development, depending on the level of enforcement provided or overspill onto the existing residential streets to the detriment of the existing residents.

This site is not within the core Ebbsfleet Development Corporation area, and so greater care should be exercised in determining the appropriate car parking provision, but even there The Corporation appears to promote 20% visitor parking.

<https://www.designforebbsfleet-sustainabletravel.org/step2>

It should also be pointed out that the Vehicle Parking Standards are dated and should no longer be used as they conflict with the National Planning Policy Framework

108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

Whilst there may be some justification for the central area of Ebbsfleet around the railway station and the Eastern Quarry site to have maximum vehicle standards imposed due to the potential level of development, the application of such standards to sites away from that core would appear to be more tenuous. It is essential to ensure visitors are provided with adequate car parking, particular when one considers visitors who may be mobility disadvantaged and require close access to their eventual destination, this design does not do that and can be considered of excluding the needs of the mobility impaired.

It is understood that car ownership in the riverside area of Northfleet averaged 1.15 vehicles per household (TEMPRO figures). So, 130 dwellings equate to 150 parking spaces if provided communally plus the 26 for visitors or 176 communal parking spaces. I note there appears to be 27 dwellings with on plot car parking provision for two cars, reducing that available for the remaining properties to 132. One hundred and three dwellings would require 119 car parking spaces if offered communally and with direct access to the space, which does not always appear to be the case with parking behind other parking spaces in many locations within the communal areas.

I therefore consider the proposed car parking provision for this development is inadequate, particularly for visitors and in particular disabled visitors. In addition, if the developer and the Planning Authority wish to encourage Active Travel, they should make secure parking available for cyclists that may visit the residents and not just the residents.

GBC - Licensing
No comment.

GBC - Parking Services
Our only comments would be to ensure that there is ample parking provisions for both residents and visitors.

GBC - Environmental Protection
This Service is in receipt of a Technical Note report provided by Stantec, dated 28th March 2023.

This document contains the results of additional noise modelling by Stantec, which identified 28 plots exposed to potentially high external industrial noise levels at night, with 6 plots identified to have mechanical ventilation.

The Service has also reviewed the Technical Note by WBM Acoustic Consultants dated 8th May 2023, which provided comments on the Stantec Report in question. This Service generally agrees and supports the contents and recommendations set out in the WBM Technical Note and would expect Stantec to tend to the concerns outlined, most notably:

- o 'The 6 plots that are to have mechanical ventilation should be clearly identified on a plan'.
- o 'The mechanical ventilation system will need to have appropriate internal noise levels, however Stantec have not set any internal noise limits'

Once the above concerns have been addressed, this Service would be satisfied to recommend partial discharge of Condition 9b.

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

The EDC is thanked for consulting the Borough Council.

Dated this 12th day of July 2023

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Planning Service