

Consultation
C/o Gravesham Borough Council
Planning Services Manager
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Your Ref: **20220852**
Our Ref: DA/22/00982/OBB
Date: 9th September 2022

Dear Sir,

Town and Country Planning Act 1990

**Consultation on Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works within Gravesham Borough Council
Land Surrounding Ebbsfleet United Football Club Bounded By Lower Road, Railway Line, Grove Road and the River Thames Northfleet Kent**

I refer to the above application which has now been considered by the Borough Council and wish to thank you for the opportunity to comment thereto.

The Borough Council wish to raise objection to the proposal subject to the reasons specified hereunder:

The red line appears to have been drawn/created in an arbitrary way. It follows the Borough boundary line between Dartford and Gravesham and the boundary between Gravesham and Ebbsfleet Development Corporation (EDC as the Local Planning Authority for this part of Dartford Borough). There appears to be no planning reason for the chosen boundary line and there are concerns that a development brought forward in this way will be unjustifiably constrained or matters outside of the red line will not be mitigated fully.

The description of the proposed development includes "re-alignment of Galley Hill Road" but the red line excludes this road extending through the junction of Galley Hill Road/Lower Road/Stonebridge Road. The red line should include all those matters listed on the description of development for which planning permission is sought.

Whilst there is a plan that is referred to as a master plan, this is only a red line site plan showing existing buildings and is not a masterplan, this is confusing and should be corrected.

Scoping comments

Cumulative assessment

Para 43 and the following paras refer to the assessment of cumulative schemes with these split into tier one and tier two schemes. Para 48 refers to the status of the schemes to be considered with these being schemes that have planning permission, a resolution to grant or that have been submitted but not determined. Para 50 refers to the consideration of the cumulative impact of other schemes within 1km of the site. This is wholly inadequate for an EIA. With regard to some of the impacts, such as Traffic and transportation a much larger area should be considered for cumulative assessment.

Cumulative assessment should look at committed developments, which is normally taken to be planning permissions within the area defined and also committed development set out in the Local Plan. There is no reason why this should not be the case with regard to this proposal.

Traffic, Transportation and cumulative impacts

There will be significant impact from the development on the surrounding area and it is important that the ES fully considers all impacts. A significant issue will be transport arising from the development but also of the cumulative impact of this with other development. The details submitted advise that other development will be considered but the methodology for this is unacceptable, see above. Further concerns are set out below.

The applicant should discuss the relevant schemes to be considered with the adjoining Local Planning Authorities (as well as Gravesham) but as a starting point this should include all committed development, within an area to be agreed with the Highways authorities, and should include identified development in the local plan and planning permissions granted. Dartford and the EDC should be approached for details of committed development in their area. Failure to consider cumulative impacts from committed development will render the ES incomplete in the assessment of cumulative impacts. In particular, the planned major development for Ebbsfleet Central, identified in the adopted Local Plan and the emerging Local Plan has not been included. This issue is referred to further in para 118 in relation to growth factors and the same approach needs to be followed.

Para 107 refers to the study area for the Transport Assessment and the junctions to be included. DBC consider that it is important that as well as Jct 1a of the A282/M25, that junction 1b is also considered. This junction is on a Fastrack and this does not have a dedicated roadway across the junction. The impact on jct 1b and Fastrack services specifically is therefore an important consideration.

In considering transport issues, the ES should consider accessibility to/at Northfleet Station. This is currently poor.

Other Issues

The scheme is likely to result in significant increased traffic levels along London Road and Galley Hill Road. This road has many sections that are adjacent to cliff faces and these are known to be at risk of chalk spalling. The ES should consider the impact of additional traffic on this road and on the stability of the cliff spine that supports the A226.

Para 71 and the table in para 72 set out the social/economic impacts areas to be scoped in/scoped out. There is concern that the table advises that impact on GP's is to be scoped out.

At para 76, the report advises that a separate Retail Impact Assessment is being considered outside the ES. It is not clear why this is not to be included in the ES. Will this cover leisure uses in the old Use Class A?

At para 77, the report advises that whilst health is scoped into the EIA, a technical chapter will be prepared and a separate Health Impact Assessment will be prepared. There does not appear to be any consideration of the impact of the proposed food/beverage facilities on a health deprived area. The Health impact Assessment should consider this.

At Para 374, the scoping report comments on visual impact and the views that are to be considered. DBC do not consider the views identified to be sufficient. Views should also be considered from London Road to the West of the site as this sits above the development as well as views from further to the south where the Downs rise. Adjoining Authorities should be consulted on the views to be assessed.

Please contact me should clarification be required on any of the above points.

In addition to the above points, the Council have received comments from Swanscombe and Greenhithe Town Council. These are set out below.

"The Town Council objects to this application as the proposal would constitute an over intensive development of the site and would result in an undesirable intensification of use to the detriment of the amenities of the surrounding area, whilst adding an unnecessary burden on local infrastructure/services.

The proposal would also add to the overcrowding of the local roads which already suffer severe issues with traffic movements/congestion and parking, and it would also increase the air and light pollution

The proposal would require construction traffic to use the local roads, and this would increase the noise and traffic pollution with a huge detrimental effect/impact to the local community which already suffers from these issues. We would ask that should the application be granted that conditions be set regarding the hours of construction and movement of vehicles to mitigate the impact.

The Town Council strongly urge that the applicant must take into account, and include mitigating provisions regarding the environmental impact on, and the needs of, the community for their development and, where possible, include the provision of Electric Vehicle Charging Points."

Yours faithfully



HEAD OF PLANNING SERVICES