



Delegated Report

EDC Consultation

Planning Application No: 20221147

Location: Car Park C Ebbsfleet International Station International Way Ebbsfleet Valley

Description: EDC Consultation - Temporary change of use to part of the existing car park, including siting of 4no. temporary prefabricated buildings, to a facility for the collection of new cars with ancillary vehicle test driving for a period of up to 24 months

Applicant: Ebbsfleet Development Corporation

Site Visit Date: None (desktop assessment)

Introduction

Ebbsfleet Development Corporation (EDC), as the determining Planning Authority, has consulted Gravesham Borough Council (GBC) for its views on the proposed temporary change of use (for a period of up to 24 months) for part of the existing car park, including siting of four temporary prefabricated buildings, to a facility for the collection of new cars with ancillary vehicle test driving at Car Park C, Ebbsfleet International Station.

Submitted Documents/Plans

The planning application documents are available on the EDC website via the following link;

[DC/22/0160 | Temporary change of use to part of the existing car park, including siting of 4no. temporary prefabricated buildings, to a facility for the collection of new cars with ancillary vehicle test driving for a period of up to 24 months. | Ebbsfleet International Car Park C Thames Way Gravesend DA11 9DT \(ebbsfleetdc.org.uk\)](https://ebbsfleetdc.org.uk/DC/22/0160)

Relevant Planning History

Reference	Description	Decision	Decision Date
20221088	EDC Consultation - Outline planning application (with all matters reserved) for mixed-use development comprising demolition of the existing car parking, structures and station forecourt and provision of residential dwellings (Use Class C3); flexible commercial, business and service uses (Use Class E) to allow provision of retail, offices, restaurants/cafes, nurseries, and healthcare facilities; flexible learning and non-residential institutions (Use Class F1); flexible local community uses (Use Class F2); hotel use (Use Class C1); residential institutions (Use Class C2); and Sui Generis uses to allow provision of co-	Pending consideration*	

	living and student accommodation, public houses/drinking establishments, and theatres/cinemas. Associated works include hard and soft landscaping, a River Park, car parking and multi-storey car parks, pedestrian, cycle and internal vehicular network, and other ancillary infrastructure, and associated crossings, highway accesses, and junction improvements.		
20020543	Works associated with the CTRL which are revisions to the previously approved package 300/GRA/1A/1 (our reference GR/98/45) specifically changes to the design of the North Kent Line Connection over STDR4 Underbridge (structure no. N20).	Permitted	02.08.2002
20010495	Application for the approval of the siting of Ebbsfleet Station and car parks within the Borough of Gravesham	Permitted	22.01.2002
19960035	The development of land for mixed use up to 789,550m2 gross floor space comprising employment, residential, hotel and leisure uses, supporting retail and community facilities and provision of car parking, open space, roads, and infrastructure.	Permitted	21.11.2002

* It is noted that the application site for planning application reference 20221088 is known as Ebbsfleet Central East and is located adjacent to the Ebbsfleet International Railway Station. The 20221088 application site includes the area of land that is the subject of this application.

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS06 – Ebbsfleet (Gravesham) Opportunity Area
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 6 – Building a Strong, competitive Economy Transport
- 9 – Promoting Sustainable Transport
- 11 – Making effective use of land
- 12 – Achieving sustainable development and well-designed places
- 15 – Conserving and Enhancing the Natural Environment
- 16 – Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006)

Consultations, Publicity and Representations

As the determining authority, EDC have the responsibility to undertake relevant statutory consultations and publicity. In addition, the following consultations have been undertaken by GBC.

GBC – Highways Officer

I consider the applicant has not submitted adequate information to allow a judgement to be made.

1. No details are provided on how deliveries will take place (articulated or rigid car transporter, or on a trailer towed by a van) and swept paths should be submitted clearly demonstrating the transporter can access/egress the car park and turn within it. Similarly details should be provided for waste removal.
2. No details are submitted regarding the use of the current car park and its spare capacity that clearly demonstrates there is adequate space to accommodate the proposal and its servicing requirements.

GBC – Commercial Team (Regulatory Services)

No comments or objections.

GBC – Environmental Protection Team (Regulatory Services).

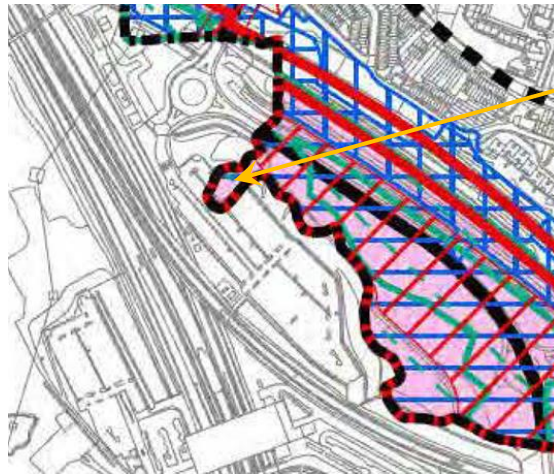
EDC should be using consultants for this application.

GBC – Economic Development Manager.

No response received.

Officer's Analysis

The application site lies within an existing industrial area mainly in Dartford Borough and in terms of development management falls under the jurisdiction of the Ebbsfleet Development Corporation (EDC). It should be noted that a small part of the application site is located in Gravesham (as identified in the image below).



Extract from Gravesham Local Plan Core Strategy Map 2014

Given this, the proposal has the potential to impact on the Borough. In addition, any vehicles entering or leaving the site would need to use the local highway network in Gravesham for access

Under section 38(6) of the Planning and Compulsory Purchase Act 2004, the application stands to be determined in accordance with the development plan unless material considerations indicate otherwise. In Gravesham, the development plan comprises:

- The Kent Minerals and Waste Local Plan 2013 - 2030 (2020)
- Gravesham Local Plan Core Strategy 2014
- Saved policies of the Gravesham Local Plan First Review (1994)

The application site is located within the Ebbsfleet Opportunity Area (Northfleet Rise Quarter Key Site), a Biodiversity Opportunity Area, the Ebbsfleet Marshes Local Wildlife Site, Flood Zones 2 and 3, the High Speed 1 Safeguarding Area, an Area of Archaeological Potential, the Bamber Pit and Southfleet Pit Historic Landfill Site Buffer Zones and Ground Water Source Protection Zone 2.

Policy CS06 of the Gravesham Local Plan Core Strategy 2014 sets out that the Ebbsfleet Opportunity Area provides a substantial opportunity for a high quality, sustainable, mixed use development that will bring new housing, business employment and supporting facilities centred about Ebbsfleet Station. In relation to the Springhead Rise Quarter Key Site, the policy states that it will provide an employment led development and a local centre. The Policy also states that provision will be made for replacement car parking to serve Ebbsfleet Station if any is displaced by development.

The Borough Council would raise the following issues;

- In terms of the submission papers, there is clearly a discrepancy between the two proposed site plans (both numbered PL101) and the location plan (PL.099) in terms of the red line boundary.
- There are errors/discrepancies in the application form, with this being contradicted by the supporting letter. The result of this is that it is difficult to understand what is actually being applied for; the scale of the operation; and potential impact – i.e.;
 - Under vehicle parking, the number of existing spaces is said to be 789 with the total proposed being 761 (-28). However, the temporary change of use being sought appears to be for the whole of the site contained within the red line boundary. If this is the case, the potential maximum loss of car parking available to the public is the entire site. On this, all the supporting letter says is: "A large area of the car park will remain open to the public as normal with the car park access remaining unaltered". There is no information on the actual number of spaces that will remain available to the public, the area that will be designated for public car parking or how that area would be operated or by whom. Clarification is required.

- Later in the letter, it is said:
 There will be 4 parking spaces for test drive cars which will accommodate any drop in opportunities from the public however this is not the main objective hence only having 4 spaces in total. The remaining area will facilitate parking spaces being used for collection bays and parking spaces for drop off of customer cars and loaner cars. Parking spaces will also be used for the preparation activities of the cars been staged/prepared for collection which include basic valeting prior to customer collection. There are also several spaces which will be kept clear for car transporter drop offs away from public areas and where possible out of busy hours”
- Under this description, the entire area within the red line boundary could be used for the above activities and the open storage of vehicles (cars + transporters). There needs to be clarification therefore as to how the site would be operated, including layout and the number of cars/vehicles that will be on site at any one time. The fact that there would be ‘opportunities for the public’ to drop in and test drive cars could also open the door for vehicle sales from the site – i.e. that nothing would preclude it being a large scale car lot rather than simply a place where customers pick up or drop off their vehicles. It is also unclear where customers would test drive cars – on the public highway or within the site itself given it would have an area of around 1.2 hectares.
- Under ‘Materials’ there is an entry for ‘boundary treatments’ which would consist of dark grey tongue and groove click fix assembly fencing with Tesla logo’. Whilst the proposed site layout plans above only show a small fenced compound adjacent to the temporary buildings, the application form refers to ‘boundary treatments’ which could mean that the entire area within the red line boundary could be fenced. Could we have clarification on this as it would preclude that part of the car park being used by the general public? If it is not the intention that the whole area will be fenced and the public will have access to the remainder of the car park (i.e. the 761 spaces) how will this be managed under the proposed change of use?
- Under ‘Assessment of Flood Risk’, the application form refers to surface water being disposed of via an ‘existing water course’ and ‘main sewer’. The following comment relates to water quality and Water Framework Directive issues rather than flood risk. Given the proposal involves the valeting of cars etc. and we have no actual idea of the scale of the operation or chemicals that might be used in valeting etc. it is of some concern that there are no further details and an assessment of potential impacts on the River Ebbsfleet. Has the Environment Agency or the Kent Wildlife Trust been consulted on this? This links to the response in the application form under Biodiversity and Geological Conservation, where the applicant has stated there would be no impact on a designated site, important habitat or other biodiversity features. However, the application site lies immediately adjacent to the Ebbsfleet Marshes Local Wildlife Site so the EDC needs to be clear on this. In addition, given we have no idea of the scale of the proposed use and what may be discharged off site to a main sewer, has Southern Water been consulted?
- Under Foul Sewage, the application form states that this will be disposed of to a Main Sewer but that the applicant is not proposing to connect to the existing drainage system. The covering letter then states “the toilet block will be emptied and refilled with water on a regular basis out of hours, so no connections are needed to the drainage system with minimal inconvenience to the public”. Which is it, so that any implications or the need for imposition of conditions can be considered?
- Under hours of use, these are stated for weekdays as being 7:00 – 19:00 and Saturdays as 7:00 – 7:00. It is taken that Saturdays should also read 7:00 – 19:00, so what is set out in the form would not allow Saturday opening. Aside from this error, clarification should be sought on Sunday opening, given the application form is blank – it is assumed that this means the site would not operate on Sundays but this should be confirmed and if necessary controlled by condition. Also, whilst the site owner presumably only allows use of the car park by visitors to the Ebbsfleet United FC stadium on a voluntary basis and this could be stopped, it is likely that

the proposal would affect the availability of parking here on Saturdays and during evening matches. Has the EDC considered the potential implications of this on the local area?

- No information appears to be provided on whether additional lighting, CCTV, amplified sound/tannoys, or advertisements/directional signage would be required. This could have an impact on the locality and the adjoining Local Wildlife Site – clarification is required.
- The issue of CIL does not apply to the Gravesham BC area and it would be a matter for Dartford BC to comment on this as applicable.
- The comments of the GBC Highways Officer (as set out above) should be taken into consideration in the determination of the application.

Recommendation

EDC be requested to consider the above comments, to request further information from the applicant and to take account of the comments of GBC Highways Officer, when making their determination.

(For detailed response and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	10 November 2022	Dated:	10 November 2022