



**Application: 20230797**  
**Your Reference: EDC/23/0096**

**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**  
**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 At Former Northfleet Cement Works**  
**The Shore**  
**Northfleet**  
**Gravesend**  
**Kent**  
**DA11 9AN**

and being **EDC Consultation EDC/23/0096 - Reserved Matters Application (matters relating to access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for the employment land at Church Path Pit comprising the erection of industrial and logistics units (Use Classes E(g)(iii) and/or B2 and/or B8) with ancillary office accommodation, external yards areas, staff and operational vehicle parking, servicing and associated works.**

Referred to in your application dated 25 July 2023.

**GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-**

This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/23/0096), and is a consultation in respect of the reserved matters application (matters relating to access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for the employment land at Church Path Pit comprising the erection of industrial and logistics units (Use Classes E(g)(iii) and/or B2 and/or B8) with ancillary office accommodation, external yards areas, staff and operational vehicle parking, servicing and associated works.

In respect of the documents the subject of this consultation, the EDC is advised that in response to internal consultation it has received the following responses:

GBC - Highways Officer

1. The plan on page 15 of the Design and Access Statement giving walking distances is totally inaccurate, as the crow flies is not representative, when there are cliff, railway embankments and lakes in the way.
2. Are additional pedestrian and cycle links being provided or does everyone have to negotiate the tunnel, which would be a deterrent to walking and cycling and distorts the walking and cycling distances significantly?
3. It is concerning that the Transport Statement states in its Trip Generation section, that 884 vehicles arrive in the am peak period with some 252 departing leaving a difference all types of vehicles of 632 which have to be accommodated on site somewhere, whilst these vehicles are not all cars, it does suggest the level of car parking provision is totally inadequate. (Note in the PM peak 795 vehicles depart the site whilst only 232 arrive, meaning 463 vehicles of all types were on site before the peak period.

There may be other issues that a more detailed study will highlight, but for now I consider the application is not representative of the true situation and should be revised to reflect that the only access is the tunnel and a parking accumulation study should be undertaken due to the substantial difference between arrivals and departures.

#### GBC - Environmental Protection

We would not ordinarily comment on these specific matters however I have looked at the EDC planning portal to see if there are any relevant documents for us and I note that there is a Noise Impact Assessment and an Air Quality Technical Note both by Stantec and both dated May 2023. There is no Technical Note for the Noise Impact Assessment.

I do not know whether it is appropriate for us to comment at this stage in the planning process however as, on reading the two reports, we are concerned about the potential dust and unknown impact on the nearby residents I have made the following comments:

#### **Air Quality**

*The application documentation includes a Technical Note by Stantec Job no 332610141 Note no. AQ08.2 May 2023 commissioned by the applicant. It is disappointing that EDC, the LPA have not engaged their own consultants to review this Technical Note with their own consultants producing a Technical Note for submission to GBC for comment.*

*The Technical Note covers the following:*

**Existing air quality** - *The Technical Note confirms that the existing air quality is likely to be the same as when the original Environmental Statement was drafted and that it remains acceptable for the proposed development. This is accepted.*

**Construction dust** - *It advises that that the potential impacts from the construction dust associated with this development are not considered to be significantly different to those detailed in the original ES and that a Construction and Environmental Management Plan (CEMP) will per prepared by the application for approval in relation to construction of the development. The Technical note lists mitigation measures in point 3.1 that will be incorporated into the CEMP. This is accepted and we expect the mitigation measures to be required by condition.*

#### **Operational impacts**

##### **Traffic**

*The Technical Note discusses national decreases in emissions from the fleet over recent years and confirms that the potential impacts from the employment land are not considered to have altered to such an extent as to affect the findings of the origin ES. This is accepted.*

##### **Open Storage**

*The technical note looks at the impact of dust from extensive areas of open storage in the Church Path Pit development site. However there is no reference to what will be stored in the open storage areas. **This needs to be clarified and the type of material restricted if it hasn't been already, to non-dusty materials as the site is surrounded by residential properties.***

*The impact of dust on the nearby residential properties on the edge of the cliffs around the site is described in the technical note as medium or negligible etc. It has apparently been calculated using the distance from receptors and wind frequency. No local i.e. on site, wind measurements*

have been taken or incorporated in the assessment. The wind speed data comes from Broadness approx. 2.3km from the site. However it is expected, in reality, that the pit will have its own wind pattern, with eddies etc which cannot be predicted with using tables etc. The technical note says that as the site is at a much lower level than the residential land, "it is naturally screened" and that the dust impact risk is negligible. **However dust is frequently whipped up from construction sites in similar pits, and also dust from aggregate open storage in the borough, impacting property, cars, homes etc when it is then deposited in nearby streets and on residential properties.** We therefore do not agree with the opinion that the dust impact will be negligible.

The conclusion says that "This assessment of dust indicated that potential effects are considered 'not significant' and would not result in residents adjacent to the Church Path Pit Employment Land experiencing an unacceptable level of impact to residential amenity due to dust deposition." However it is evident in this borough that those residential properties on the top of cliffs, surrounding construction sites and aggregate storage sites are regularly impacted upon by windblown dust. **We therefore have significant concerns about the use of the open storage areas for dusty material and the impact on the residential properties above the development in terms of dust.**

**Clarification needs to be provided to this service that the use of the open storage yards will not be for any dusty materials.**

### **Noise**

This is an EDC application. The application documentation does not appear to include a Technical Note drafted by EDC's own consultants following the review of the Noise Impact Assessment "Church Path Pit Employment Land" Project ref 332610141 Rev: 1 Date May 2023 carried out by Stantec on behalf of the applicant NWM Properties Limited.

It is disappointing that EDC, as the LPA, have not employed their own consultants to review the NIA and produce a Technical Note for this service to comment on. It is considered that this is still necessary and that it should be commissioned and delivered with a copy provided to this service in order for us to comment further. **The Technical Note needs to be drafted following a review of the NIA and must not be done by Stantec as they are the author of the NIA.**

In the meantime I have briefly looked at the NIA. The NIA is based on a noise survey carried out in 2008 some 15 years ago. It is not possible for me to comment on whether the noise environment has changed in the location of the site over the last 15 years, and I would have expected that a new noise survey was carried out to ascertain if it had or not. It is noted that the conclusion of the NIA in 6.1.3 says that "due to the relative age of the original survey it is recommended that a verification survey be undertaken to confirm the underlying sound levels in the worst affected receptors and that the findings of this report will be subject to change if the verification survey indicates that background noise levels differ from those used for this assessment." **This needs to be carried out as recommended.**

The conclusion goes on to say in 6.1.7 that "this assessment has determined that the requirements of the Local Planning Authority are likely to be met for all potential noise impacts. Therefore, the development is likely to be acceptable in relation to the potential noise impacts identified herein." **This service cannot confirm that we agree with this statement at this time. A verification survey needs to be carried out and a review of the NIA and a subsequent technical note produced and provided to this service for comment.**

### **Recommendation**

The schedule of accommodation as laid out as follows:

| 23006 - NEW         |       |        | NEWFLEET EMBANKMENT EAST     |        |        |       |                     |        | WRAP                              |  |
|---------------------|-------|--------|------------------------------|--------|--------|-------|---------------------|--------|-----------------------------------|--|
| REV-06              |       |        | INDUSTRIAL UNITS - ALL SITES |        |        |       |                     |        |                                   |  |
| DATE: 24th May 2023 |       |        |                              |        |        |       |                     |        | Prepared by: AH                   |  |
|                     |       |        | INDUSTRIAL UNIT              |        | OFFICE |       | TOTAL AREA PER SITE |        | NOTES                             |  |
| SITE                | GEA   | GEA    | GIA                          | GIA    | GIA    | GIA   | GIA                 | GIA    |                                   |  |
|                     | M2    | SQF    | M2                           | SQF    | M2     | SQF   | M2                  | SQF    |                                   |  |
| TRIANGLE SITE       | 13616 | 146563 | 12494                        | 134485 | 2345   | 25242 | 14839               | 159727 |                                   |  |
| VINEYARD PIT SITE   | 4120  | 44348  | 3074                         | 33089  | 2272   | 24456 | 5346                | 57544  |                                   |  |
| CHURCH PATH PIT     | 4640  | 49945  | 24455                        | 263234 | 1195   | 12863 | 25650               | 276097 | Includes 20,335m2 of open storage |  |
|                     |       |        |                              |        |        |       |                     |        |                                   |  |
| TOTALS              | 22376 | 240855 | 40023                        | 430808 | 5812   | 62560 | 45835               | 493368 |                                   |  |

TOTAL BUILDING (M2) ON ALL 3 SITES MINUS OPEN STORAGE AREAS

25500

#### NOTES

All areas are indicative and require further ratification through design development.  
Office areas include office accommodation at first floor level and cores at ground floor level.  
GIA measurements include all internal walls to inside face of external wall.  
Allow +/- 2% to all areas until accurate studies have been undertaken.

23006 - NEW

REV-06

DATE: 24th May 2023

TRIANGLE SITE

WRAP

Prepared by: AH

|          |       |        | INDUSTRIAL UNIT |        | OFFICE |       | TOTAL AREA PER UNIT |        | NOTES |
|----------|-------|--------|-----------------|--------|--------|-------|---------------------|--------|-------|
| BUILDING | GEA   | GEA    | GIA             | GIA    | GIA    | GIA   | GIA                 | GIA    |       |
|          | M2    | SQF    | M2              | SQF    | M2     | SQF   | M2                  | SQF    |       |
| UNIT A   | 485   | 5221   | 366             | 3940   | 201    | 2164  | 567                 | 6103   |       |
| UNIT B   | 2881  | 31011  | 2669            | 28729  | 377    | 4058  | 3046                | 32787  |       |
| UNIT C   | 2850  | 30677  | 2646            | 28482  | 473    | 5091  | 3119                | 33573  |       |
| UNIT D   | 2850  | 30677  | 2646            | 28482  | 473    | 5091  | 3119                | 33573  |       |
| UNIT E   | 2850  | 30677  | 2646            | 28482  | 473    | 5091  | 3119                | 33573  |       |
| UNIT F   | 1700  | 18299  | 1521            | 16372  | 348    | 3746  | 1869                | 20118  |       |
| TOTALS   | 13616 | 146563 | 12494           | 134485 | 2345   | 25242 | 14839               | 159727 |       |

#### NOTES

All areas are indicative and require further ratification through design development.  
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GIA measurements include all internal walls to inside face of external wall.  
Allow +/- 2% to all areas until accurate studies have been undertaken.

23006 - NEW

REV-06

VINEYARD PIT

WRAP

|                     |      |       |                 |       |        |       |                     |       |                 |
|---------------------|------|-------|-----------------|-------|--------|-------|---------------------|-------|-----------------|
| DATE: 24th May 2023 |      |       |                 |       |        |       |                     |       | Prepared by: AH |
|                     |      |       | INDUSTRIAL UNIT |       | OFFICE |       | TOTAL AREA PER UNIT |       | NOTES           |
| BUILDING            | GEA  | GEA   | GIA             | GIA   | GIA    | GIA   | GIA                 | GIA   |                 |
|                     | M2   | SQF   | M2              | SQF   | M2     | SQF   | M2                  | SQF   |                 |
| UNIT A              | 480  | 5167  | 370             | 3983  | 254    | 2734  | 624                 | 6717  |                 |
| UNIT B              | 480  | 5167  | 370             | 3983  | 254    | 2734  | 624                 | 6717  |                 |
| UNIT C              | 480  | 5167  | 370             | 3983  | 254    | 2734  | 624                 | 6717  |                 |
| UNIT D              | 480  | 5167  | 370             | 3983  | 254    | 2734  | 624                 | 6717  |                 |
| UNIT E              | 371  | 3993  | 267             | 2874  | 210    | 2260  | 477                 | 5134  |                 |
| UNIT F              | 358  | 3854  | 263             | 2831  | 208    | 2239  | 471                 | 5070  |                 |
| UNIT G              | 371  | 3993  | 267             | 2874  | 210    | 2260  | 477                 | 5134  |                 |
| UNIT H              | 371  | 3993  | 267             | 2874  | 210    | 2260  | 477                 | 5134  |                 |
| UNIT J              | 358  | 3854  | 263             | 2831  | 208    | 2239  | 471                 | 5070  |                 |
| UNIT K              | 371  | 3993  | 267             | 2874  | 210    | 2260  | 477                 | 5134  |                 |
| CAR PARK SITE       | 0    | 0     | 0               | 0     | 0      | 0     | 0                   | 0     |                 |
| TOTALS              | 4120 | 44348 | 3074            | 33089 | 2272   | 24456 | 5346                | 57544 |                 |

#### NOTES

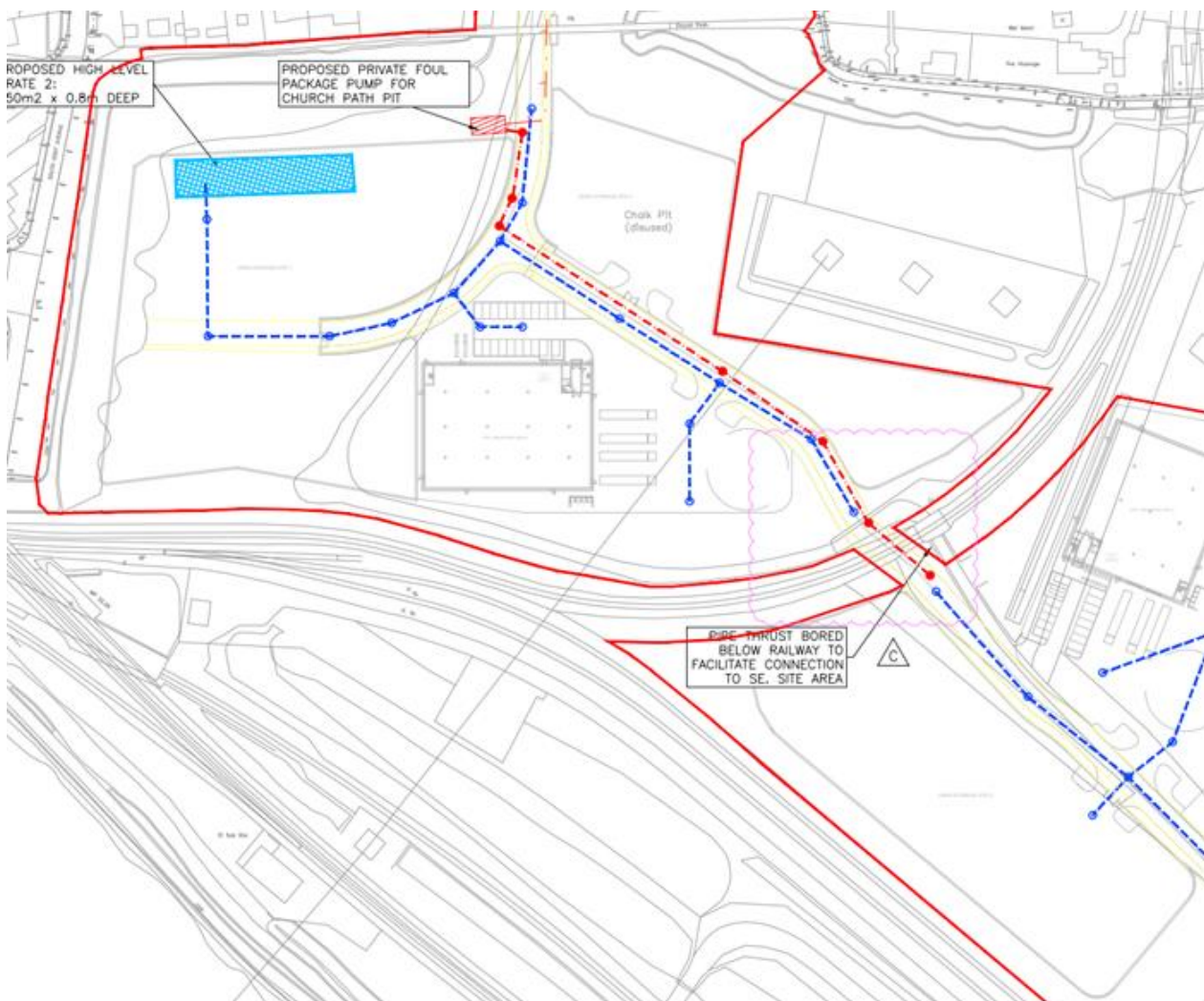
All areas are indicative and require further ratification through design development.  
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GIA measurements include all internal walls to inside face of external wall.  
Allow +/- 2% to all areas until accurate studies have been undertaken.

Core Strategy Table 6 assumes 46,000 sqm gross whereas the above shows as 45,835 SQM but this includes 20,335 sqm open storage in Church Path Pit - so built floorspace would be down which presumably would have an effect on job generation.

Reserved matters application covers about 20,185 sqm GIA.

There appears to be very little information about the Chalk Path Pit development including the open storage which is only shown hatched in blue on the illustrative masterplan, but with no further details.

There is a drainage map that shows open storage sites 1, 2 and 3, which includes a high level crate in site 1:



From the submitted documents, there are only air quality and noise impact assessments for Triangle Site and Vineyard Pit Employment Lane. The open storage in Church Path Pit does not appear to have been considered.

Therefore the Local Authority raise concerns over the amount of open storage (just over two hectares), it's location, how it is to be used and the overall impact, which does not appear to have been assessed fully from the submitted details.

## Conclusion

The EDC is requested to consider the above comments in addition to the recommendations from the Borough Council's Highways and Environmental Protection Officers.

The EDC is thanked for consulting the Borough Council.

Dated this 13th day of October 2023

Address; Civic Centre  
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DA12 1AU

*Wendy Lane MRTPI*  
Assistant Director (Planning)  
**Planning Service**