



Application: 20240360
Your Reference: EDC/23/0086

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

and being **EDC Re-Consultation EDC/23/0086 - Reserved matters application (access, layout, scale, appearance and landscaping)** pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land north east of College Road (Phase 3A) comprising the erection of 273 no. 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), community facility (condition 14), 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).

Referred to in your application dated 18 April 2024.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

1 This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/23/0086), and is a re-consultation in respect of the reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of Outline Planning Permission reference no. EDC/16/0004 for Land North East of College Road (Phase 3A) comprising the erection of 273 no. 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), community facility (condition 14), 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.

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

External Consultations

Kent Police Designing Out Crime

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime

levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We request a condition for this site to follow SBD guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our

Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.

2. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways to have secure side gates, which are lockable from both sides, located flush to the front building line.

3. To meet SBD guidance we would strongly recommend the installation of pavements on both sides of the roads to avoid vehicle and pedestrian conflict and promote safer spaces for families. It is now common practice to have some shared vehicle/ pedestrian areas on secondary routes. If pavements cannot be installed in these shared spaces, we strongly recommend traffic calming measures, especially where there is a curvature in the road.

4. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or sold secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting - the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse. Undercroft areas can attract crime and therefore, should be finished in a light colour and be well lit. If car ports are unavoidable, we recommend they be lit and painted in a light colour to optimize surveillance opportunities. For car parks, we recommend the Safer Parking Scheme, which follows CPTED guidance from both the police and the British Parking Association.

5. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

6. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states:"18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial

features and as a result causes an increase in the fear of crime. It should be avoided. "Lighting of all roads including main, side roads, cul

de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.

7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.

8. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.

9. We advise on the use of ground/ wall SBD or sold secure anchors within a cycle storage area/ sheds of dwellings to deter bicycle theft.

10. Mail delivery to meet SBD TS008 with a fire guard are strongly recommended for dwellings. For buildings with multiple occupants we recommend TS009 standards. Please note we advise against trade buttons, if mail is to be delivered inside a lobby there must be an airlock/ access-controlled door to prevent access further into the building for anyone other than residents.

11. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.

12. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.

13. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.

14. CCTV is advised for all communal entry points and to cover the mail delivery area.

15. Defensible spaces. Corner properties require well established boundaries to avoid desire lines across front gardens. This can be provided by using hedges or knee rails/ fences, for example.

16. Blank Walls. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, inappropriate loitering, and ball games. The provision of a 1m buffer zone using either a 1.2 - 1.4m railing or a 1m mature height hedge with high thorn content should address those issues.

17. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing nuisance.

18. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict or ball games causing nuisance. For any LAP or LEAP, we recommend fencing at a minimum height of 1.2m and vandal resistant play equipment. Consideration should be given to a single dedicated entry and exit point to enable adult control/supervision.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Internal Consultations

GBC Housing Strategy (comments from previous application with ref. 20230731)

I have the following comments on three documents submitted as part of the application to EDC ref EDC/23/0086:

o Phase 3A Affordable Housing Statement 30/05/23

- o Typical Floor - Tenure Strategy
- o Ground Floor - Tenure Strategy

I note that 82 affordable housing units are provided in this phase out of the 273 dwellings and that this equates to a policy compliant 30% of the total number of units in that phase. I am therefore satisfied that the number of affordable dwellings proposed is correct.

Also, in accordance with the S106 Agreement for the scheme, the tenure of the affordable housing meets the 60/40 split in favour of shared ownership.

However, in terms of the sizes of the rented homes I note that all homes are to be provided as flats. Looking at all phases on the site I note that there have only been 8 houses made available for rent. I would therefore request whether Bellway are able to provide any affordable houses for rent amongst the 82 total affordable housing units on this phase.

As affordable rented homes are needed for different household sizes, some of the 18 x 2 bed 4-person affordable rent flats should be provided as 2 bed 3 person homes.

There are 24 x 1 bed 2 person flats for shared ownership proposed. From experience of the shared ownership and RP market for shared ownership, I consider this number too high and would suggest a cap of 12 x 1 bed 2-person shared ownership flats, converting the remaining 12 to 2 bed 3 person flats.

Finally, the 4 x 1 bed 2-person wheelchair accessible flats should be made available for rent rather than shared ownership as there is more demand for this type of accommodation for rent.

I would welcome a discussion with Bellway and the current RP as to whether the affordable housing mix can be changed to diversify the affordable housing sizes of accommodation.

GBC - Highways Officer (comments from previous application with ref. 20230731)

I believe the cycle parking strategy does not allow for charging electric cycles that have batteries built into the frame, or for the independent secure storage of deluxe cycles. That may cost several hundred if not thousands of pounds. Whilst it is accepted that not everyone will own such cycles it is deemed appropriate that some limited provision should be made. It is also unclear what if any provision has been made for adaptive cycles which can also be used by the mobility impaired and so should be pepper potted around the development to ensure they are closely associated with every property on site.

Drainage Strategy seems appropriate, but this will be considered in more detail by others.

Lighting Strategy should be considered by others, if this is not the case then more details should be submitted including a detailed lighting design.

Car parking. It is disappointing that some parking bays appear to have minimal if any visibility when placed adjacent to walls etc, suitable visibility panels should be incorporated to ensure that drivers do not emerge blindly into the path of another vehicle or pedestrian. It is also noted that some cycle stores have doors that open obstructing access/egress to/from a parking space or more importantly its pedestrian access, again potentially a hazard, particularly for the mobility impaired which although minimal should be avoided.

Transport Note. I have concerns regarding the possible under provision of car parking given the adopted Ebbsfleet Development Corporation Parking Standards, but only time will tell if the provision is adequate, unfortunately there is no possibility of increasing parking should it become necessary. I note other than Fastrack the roads will not be adopted, meaning the maintenance and parking enforcement will be an additional cost that residents will need to fund in a period, at least at present of high inflation. It also means that if funds are not available, or the management company decides for other reasons, parking enforcement or maintenance may not take place. The visitor parking provision is inadequate compared to the requirements of Kent County Council which requires a 20% provision based on the number of dwellings or 55 spaces instead of the 16 proposed. Whilst it is noted that there are very good public transport links east to west through Gravesend, the same is not true for visitors approaching from the north or south.

The sight line shown on drawing 332410098_300.100_007 is appropriate for a 20mph target speed, yet there only seems to be a speed table at the junction to control vehicle speeds. The Kent Design Guide suggests that speed restraint features are required at 60 metre intervals to achieve a target speed of 20mph. Given the Fastrack route is a principle means of access to the development and the use of Fastrack should be encouraged there is potentially greater merit in a design speed of 25mph which requires 33m x 2.4m x 33m which should be achievable and requires according to Kent Design speed restraint features at 100 metres and is suitable for a Major Access Road rather than a minor access road which would serve some 100 dwellings.

GBC - Environmental Protection (comments from previous application with ref. 20230731)

We are interested in the noise part of the application however I have checked the EDC portal for this and note that the only recent noise submission is the 57 page Northfleet Embankment West Phase 3A Planning Condition 9b Acoustic Report.

There does not appear to be a noise technical note that EDC's own noise consultants have produced.

We will not be commenting on the full acoustic report and we await the submission of the Technical Note which we will then comment on.

In terms of the proposed landscaping, we would like to see native landscaping implemented with a variation of species within the scheme and a suitable planting schedule and management plan.

Recommendation

The EDC is requested to consider the comments from the Kent Police Designing Out Crime Officer and any KCC - Biodiversity comments directly provided to the EDC, together with the previous recommendations from the Borough Council's Housing Strategy and Development, Highways Officer, Parking Services, Environmental Protection and Conservation Officer.

The EDC is thanked for consulting the Borough Council.

Dated this 10th day of May 2024

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