

Please ask for: Mrs Karen Cronin  
Our Ref: EDC/22/0180  
Date: 7<sup>th</sup> December 2022



Sent by email only to:

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Ebbsfleet Development Corporation  
The Observatory  
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Dear Ms Henry

**GBC APPLICATION NUMBER: 20221064**

**LOCATION:** Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend.

**PROPOSAL:** Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.

I write in response to your letter dated 16<sup>th</sup> November 2022 inviting the views of the Ebbsfleet Development Corporation (EDC) on the above outline planning application currently under consideration by Gravesham Borough Council.

The site does not fall within the urban development area of the EDC. However, the scale and direct adjacency of the proposed development is such that it could have significant effects on approved and planned new developments within the EDC's boundary and we have some observations that we request the Borough Council take into account.

These comments are provided by EDC in its role as adjacent local planning authority but also land owner of adjacent land at and around Northfleet Harbour/Grove Road and as landowner and applicant for a live outline planning application (EDC reference EDC/22/0168) for major mixed use redevelopment of land around Ebbsfleet International Railway Station.

EDC is supportive of comprehensive mixed use redevelopment but, to ensure benefits of the scheme are maximised, we consider that development proposals at Northfleet Harbourside should be informed by, and be complimentary to, development proposed in the adjacent area, particularly at Northfleet Riverside and Ebbsfleet Central. The Ebbsfleet Implementation Framework, which was endorsed by Gravesham Borough Council, establishes the vision for these areas.

The proposed mix of land uses is supported and could facilitate creation of a sustainable extended

community in Northfleet. The principle of a new multi-use stadium as the home ground for Ebbsfleet United Football Club is also supported and presents further opportunities for bringing social and economic benefits to the area.

The provision of different housing types and tenures, including accessible housing, is essential to deliver a mixed and balanced community, so it is concerning that the viability appraisal suggests that the scheme could only support a limited amount of affordable housing which raises concerns over whether the scheme would meet the needs of local people. Assessment of the viability appraisal is a matter for the Borough Council but the apparent lack of viability raises concerns about the quality of the development that can be provided and the impact this could have on the regeneration aims for the surrounding area.

In addition to housing, it will be necessary to ensure the development includes provision of an appropriate quantum of supporting floorspace such as community buildings and healthcare facilities, which should be delivered in a timely manner to meet the needs of the future residents and also in an integrated manner to support and be complimentary to wider development proposals in the area. The proposed development would generate the need for additional primary and secondary school places and, whilst the draft heads of terms for a s.106 Agreement have been provided that include contributions towards education, the application does not allow for any on-site education provision nor does the viability appraisal appear to account for any financial contributions to support the proposed development, which questions the ability for the scheme to secure additional education capacity which is a concern and would place greater pressure on other developments to meet this need.

The application includes a substantial quantum of retail and leisure floorspace which exceeds what would be required to meet the needs of the future residents and workers who would be occupying the development, and therefore likely to compete with existing and planned retail centres. As noted above, EDC currently have an outline planning application under consideration for Ebbsfleet Central East and, in line with existing and emerging Local Plan allocations, includes provision of a local centre and a district centre. The submitted Retail and Leisure Assessment concludes that the proposed development would not have a 'significant adverse impact' on the vitality or viability of any existing or planned retail centre. Whilst ultimately a matter for the Borough Council to consider in assessing this planning application, EDC is unconvinced by this conclusion and consider that the quantum of retail and leisure floorspace proposed would compete with the existing and planned centres at Gravesend, Northfleet, Swanscombe and Ebbsfleet Central East and therefore have concerns that this would result in an adverse impact and divert potential investment away from these areas.

The provision of two new areas of publicly accessible open space is positive and this should be designed having regard to and being complementary to wider open space proposals in the local area, including proposals for land within the EDC boundary, Ebbsfleet River Park and the Northfleet Riverside Park. The Ebbsfleet Implementation Framework provides details of the vision for these spaces, and it is relevant to note that sections of the Northfleet Riverside Park, which overtime is planned to provide enhanced connections to Gravesend Town Centre, are currently being delivered by private developers as part of the approved schemes at Northfleet Embankment West and Northfleet Embankment East. The open space should meet the needs of the development and be provided in a timely manner relative to scheme delivery and should also ensure good access and connectivity for residents in the surrounding areas noting that local people have limited access to open space at present.

The development has the potential to have a significant impact on traffic and congestion around the Ebbsfleet area and Bean and Ebbsfleet Junction of the A2. A key issue for EDC will be understanding the impact of the proposed development on Thames Way (A226), noting that this road would provide the most direct route between the application site and the strategic road network (A2) but which also runs through the heart of the allocated Ebbsfleet Central site. Whilst a Transport Assessment (TA) has been submitted it is clear that this is a holding report so full

appraisal of the transport impacts of the proposed development can only be completed once the supplementary TA is available. For example, no Transport Strategy has been prepared to summarise how measures and mitigation would be implemented nor has the TA considered a scenario incorporating the Ebbsfleet Central East scheme as well as the junction alterations associated with that scheme, both of which are considered necessary to enable a full and robust assessment of the application. EDC would ask to be re-consulted once this supplementary TA is submitted.

The site is well located to benefit from public transport and active travel modes and it is considered important to ensure that the proposed development is progressive regarding the incorporation of sustainable transport infrastructure across the development. It is positive that the application includes reference to the Ebbsfleet Sustainable Travel Strategy and that the scheme includes reduced vehicle parking, use of car clubs and additional pedestrian and cycle paths. It is considered that the scheme should commit to provision for Fastrack bus services to operate through the site and any planning consent should consider embedding mechanisms to secure the comprehensive delivery of Fastrack infrastructure including connections to, and supporting delivery of, the wider Northfleet Riverside route.

The site presents opportunities for improved access both to and along the River Thames and consideration should be given to adjacent schemes to seek to ensure complimentary and well connected schemes that tie into and/or supplement existing and planned routes including public rights of way, cycle paths and the England Coast Path. It is considered that there is potential for enhanced connectivity beyond that currently proposed, particularly between the application site and the land at and around Northfleet Harbour. This adjacent land is owned by EDC for which a principal aspiration is to provide an open space and community hub connection between the planned Northfleet Riverside Park and the Ebbsfleet River Park. The proposed development would present further opportunities to provide riverfront access and connections to these future parks which should be taken. EDC would welcome a discussion with the applicant to feed into detailed design work at the appropriate stage.

Regarding scale and massing of the proposed development, the parameter plans show buildings up to 20 storeys in height across the site, including adjacent to the EDC boundary. EDC generally supports the inclusion of tall buildings but notes that in order to play a positive role in the built form and skyline it is important that they are exceptionally well designed in all respects, including architectural detailing, articulation and materials but also human scale considerations such as pedestrian scale components and environmental impacts such as sunlight, daylight, overshadowing and wind micro-climate.

In terms of benefits to local people, EDC would encourage consideration to incorporating measures to commit to local training and employment opportunities both during the construction and operational phases of development. This would complement the approach being taken by EDC in respect of securing social value through development. It is also recommended that consideration is given at this stage to opportunities for future community engagement and co-design particularly in respect of local people with an understanding of the area's history and heritage informing the design and form of public spaces and the form and features of community facilities to ensure they are designed to meet local needs as far as possible. It is also considered necessary that mechanisms are put in place to require approval of management arrangements to ensure long term stewardship of the development including public open spaces and community facilities.

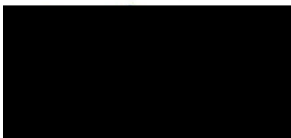
Whilst flood risk is a matter for the Borough Council to determine following input from organisations such as the Environment Agency and the Lead Local Flood Authority, EDC's response to the EIA scoping opinion raised comments received from the Environment Agency and local people in response to proposals for development at Grove Road and recommended that options for de-culverting the section of the River Ebbsfleet that lies within the eastern boundary of the application site are fully explored as it would offer potential benefits in respect of flood resilience as well as

ecological enhancement and place-making. Whilst this does not form part of the proposal, the applicant has committed to a detailed culvert survey being undertaken at the reserved matters stage and indicated a possible diversion of the culvert. It is unclear at this time what impact this will have on land in EDC ownership. EDC should be consulted on any works to the culvert and seek reassurances that any development will not increase flood risk within our boundary.

Finally, it is noted that the application proposes loss of the land safeguarded through planning policy to support the import, export and handling of goods associated with Robin's Wharf, with the application concluding that the need for the development overrides the presumption for safeguarding. EDC do not offer comment in respect of the proposed loss of this facility but it is unclear what is proposed to happen to the remaining area of the safeguarded land that falls within EDC's boundary, and also what is proposed to happen to the redundant wharf itself. As this is not considered as part of the comprehensive redevelopment of the site this could create an unattractive edge to the development and the EDC boundary and impact adversely on the future development potential of this area.

EDC are grateful for the opportunity to comment on this application and look forward to being consulted further as this application progresses.

Yours sincerely



Director of Planning & Place