



Application: 20231101
Your Reference: EDC/23/0163

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**
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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 Rosherville Way And Crete Hall Road**
Northfleet Embankment East
Employment Southern Parcel
Rosherville Way
Northfleet

and being **EDC Consultation - Development of previously developed land to provide 3528m² of employment floorspace, comprising Use Classes E(b) (Food and Drink), E(g)(i) (Office), E(g)(ii) (Research and Development), and E(g)(iii) (Light industrial) with associated site access, parking and landscaping.**

Referred to in your application dated 27 October 2023.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

1 In relation to the submitted application, the EDC is requested to consider the following comments:

Kent Police Designing Out Crime Officer:

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. We recommend boundary treatments be a minimum of 2m and the installation of lockable gates to the sides of the unit to provide controlled access to the rear. These gates must be flush to the building line to optimize surveillance.
2. We recommend natural surveillance for parking areas. As a secondary layer of security, we would also recommend CCTV be installed to further monitor use. We also strongly recommend gating access roads/ parking areas to prevent nuisance parking and misuse out of hours.
3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. Cycle storage must be well lit and with natural surveillance. We recommend the sold secure or SBD recommended products for additional security.
5. 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. we recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.
6. CCTV to be installed, especially in areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car park and reception, main office/ safe. The CCTV must not infringe any lighting plan.
7. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
8. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
9. Windows on the ground floor 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. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
10. The Access Control, Doorsets and Windows should also meet SBD Commercial 2015 advised standards. Any public access to commercial units should be restricted to one main public/visitor entrance into the building. Reception, Audio/Visual systems linking to the reception or personnel managing access control is essential for businesses that could attract crime risk (we can advise). For doorsets, we recommend minimum standards of PAS 24:2022, LPS 1175: Issue 7, SR2, STS 201 or STS 202: Issue 3, BR2. Units may require additional strengthening for some uses.
11. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013
12. Bin Stores must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the

building that it can be used as a climbing aid into the building when closed. Please note where there is a mixed-use building, residential and commercial bins must be segregated.

13. 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.

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.

GBC Environmental Protection:

Without time to look through the technical documentation I can provide general comments:

A mixed commercial use such as that being proposed is preferable in this location, due to its nearness to other noise generating commercial and industrial uses, e.g., Lidl warehouse and Red Lion PH, which would make additional residential use inappropriate.

There are no obvious significant concerns, but I would suggest that (unless already dealt with within the submitted documentation):

- Permitted hours of use are suitably controlled by condition to protect the amenity of occupiers of the new residential units to the northeast and east, as the buffer zone between the sites would provide little attenuation and protection against particularly noisy uses, and especially early morning and evening/night when background noise will be lower.
- Permitted hours of collections and deliveries should also be controlled for the same reasons, albeit in relation to noise from vehicles on the highways too. This is something that has caused problems in the industrial area vicinity before, with lorries etc. banging and crashing along the roads when nearby residents are trying to sleep or relax, made worse when road surfaces inevitably deteriorate.
- The area is also currently a declared AQMA for particulate matter and so consideration will need to be given to this and the effects of the proposed uses and additional traffic on air quality, both in this area and in any other AQMAs additional traffic will need to pass.
- Potentially contaminated land will need to be identified and remediated prior to first use.
- None of the units should be permitted to be used for any purpose involving the presence of live animals.
- Lighting will need to be designed to ensure it does not cause nuisance to residents with reference to compliance with suitable guidance, e.g., the ILP Guidance Note for the reduction of obtrusive light.

In addition to this the following has been received:

Phase I & II contaminated land assessments, an Air Quality Assessment, a Noise Impact Assessment and Environmental Sound Survey have submitted. As per our usual procedure (and agreed with EDC), we would not review and comment on these documents but expect EDC to arrange for their own consultants to look at these and then present a technical summary/critique for us to review.

We have received complaints from residents in the new housing regarding the ongoing construction work in the area, so a detailed Demolition and Construction Environmental

Management Plan will be required in order to minimise the impact of the works on the amenity for the residents.

GBC Highways Officer:

It is noted that there has been significant pre-application discussion, however I consider there are some issues that have not been considered appropriately.

I shall not comment on traffic generation, as I note that National Highways have raised an issue that should be resolved. Although I doubt this development would have a significant impact on the highway, particularly if it is to serve the local population rather than attract employees from a wider area, but on this there is no control.

In terms of car parking the applicant I believe needs to consider his proposal again.

The café has no significant vehicle parking provided, as it is intended to serve the development and nearby housing, although when considering traffic generation, the Transport Statement accepts there may be some pass-by customers.

(Image inserted can be viewed in the Officer's Report)

I note the reference to the previously consented scheme, but given the other employment sites in the area, this would appear to be an oversight, as often cafés have a better offer than canteens, which may or may not be open first thing in the morning and people are more likely to stop on their way to work and collect a takeaway, rather than park at their destination and walk to collect their morning sustenance. The applicant should be prepared to fund the introduction of waiting restrictions should on street parking become an issue within 5 years of the café being opened for business.

On site car parking. The table associated with Paragraph 4.8.2 states there will be 78 car parking spaces, which is suggested one more space than would be permitted under the Ebbsfleet Sustainable Travel Strategy if the café is ignored, 116 with the café. The Transport Statement suggests under the worst case with all buildings being used as offices, there will be 79 arrivals and 6 departures in the morning peak, giving a parking demand of 73 spaces, which would leave just 6 spaces for visitor parking. This, however, is the worst case, but does suggest that parking should not be allocated to individual units but be communally based allowing for the utmost degree of flexibility on how the spaces are used and would permit users of the café to use the car parking provided even if it is not directly associated with it. So again, the applicant should be prepared to fund the introduction of waiting restrictions should on street parking become an issue until 5 years after the employment element of the site being 85% occupied.

Shared surfaces should no longer be used for pedestrians and cycles as this can create issues for the mobility impaired particularly the partially sighted or blind. Best practice is detailed in Local Transport Note 1/20, On page 9 part of Section 1.6 the following is stated,

(Image inserted can be viewed in the Officer's Report)

In terms of pedestrian and cycles crossing road junctions, whilst the Highway Code may not be design guidance, the establishment of the hierarchy of road users should be taken note of and due allowance made. This conflicts with the view of the applicant's consultants when considering the Road Safety Audit. The Safety Auditors view in relation to the first point raised in the safety audit report should be accommodated, indeed increased to comply with the requirements of LTN1/20.

Extract from the Road Safety Audit

(Image inserted can be viewed in the Officer's Report)

The Highway Code states,

Rule H2 - Rule for drivers, motorcyclists, horse drawn vehicles, horse riders and cyclists

At a junction you should give way to pedestrians crossing or waiting to cross a road into which or from which you are turning.

Rule H3 - Rule for drivers and motorcyclists

You should not cut across cyclists, horse riders or horse drawn vehicles going ahead when you are turning into or out of a junction or changing direction or lane, just as you would not turn across the path of another motor vehicle. This applies whether they are using a cycle lane, a cycle track, or riding ahead on the road and you should give way to them.

Therefore, appropriate visibility should be available for drivers to see pedestrians and cyclists and be able to stop, if necessary, at a junction. Note should also be taken of the visibility requirements of cyclists which for a design speed of 30kph (20kph absolute minimum) is 31 metres (17m), extending to 47metres if the gradient exceeds 3% downhill. All design details taken for LTN1/20 Table 5-4.

With reference to the type of vehicle that may visit the site, with increasing emphasis on minimising empty HGV trips, (not least caused by a lack of HGV drivers, but also as a desire to reduce pollution by reducing empty running) there is the possibility of deliveries and collections forming a part load on larger vehicle and so all vehicles should be readily accommodated and without the risk of collision. Care must be exercised when using Manual for Streets Guidance in relation to lorries and the adjustment for deceleration rate in Manual for Streets 2 should be used when considering visibility requirements for HGV's. It is noted that there is a threshold for using these figures when considering visibility requirements on exiting a junction where HGV and buses is less than 5% of flow, (no split of development flows or existing flows on the highway have been provided) subject to consideration of local circumstances, but this an area with a selection of other employment offers with their associated vehicle movements and so it is considered appropriate to accommodate the requirements of Manual for Streets 2

(Image inserted can be viewed in the Officer's Report)

This increases the sight line requirement at 10mph to 12 metres, which is only a small increase, but an essential one when considering pedestrian and cyclist safety. Obviously, any increase in junction radii, would increase vehicle speeds and in turn visibility requirements. The radii at the junction is a matter for the Highway Authority as it will form part of the adopted highway and this should be agreed with Kent County Council adoption team prior to planning approval.

(Image inserted can be viewed in the Officer's Report)

Extract from Drawing Number 15706-T-03 Rev P2 dated 29/08/23

Whilst it is accepted this shows two articulated lorries passing, it does involve some conflicting manoeuvres, which without adequate visibility will compromise highway safety.

1. A vehicle entering the site conflicts with a vehicle emerging and whilst vehicle speeds may be low and so the possibility of a collision may be avoided, it could result in one or both vehicle having to reverse to resolve the situation, and this could be hindered by following traffic. The vehicle entering may not come to a stop in the turning lane if its turn is unhindered by a vehicle travelling south. The radii and visibility should be improved to prevent this occurring.
2. The bend within the site requires vehicles to pass on the wrong side of the carriageway, to prevent collision adequate sight lines need to be provided. This is when people forget that approaching vehicles must be able to stop in time, so a collision is avoided, as such forward visibility needs to be doubled so that vehicles come to a halt just before they collide. So assuming a 10mph design speed the forward visibility requirement would be 2 x 12m or 24m for HGV's. This would equally apply at any other collision point with distances varying depending on the design speed. Forward visibility splays should be plotted for the spine road for all relevant areas and the measures taken to ensure the design speed can be clearly achieved shown.

(Image inserted can be viewed in the Officer's Report)

Given the level difference between Rosherville Way and London Road (B2175) Due consideration should be given to establishing resting points on the pedestrian route. Given the nature of the route, it is doubtful but not impossible the route would be used by those with a significant physical

mobility handicap, but it would not exclude all disabled people or those with other mobility but not recognised disabled medical conditions that require a rest when negotiating level differences. It maybe that perch type seats at reasonable intervals may be adequate. The Governments Guidance Inclusive Mobility suggests that a person using a stick or cane can manage a distance of 50 metres between resting places.

Below is an extract from Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure issued by the Department for Transport in December 2021.

(Image inserted can be viewed in the Officer's Report)

Despite the previous consultations, I believe there are issues that need to be resolved as well as an agreement reached with Gravesham Borough Council as enforcing authority and Kent County Council as the Highway Authority to fund the entire waiting restriction process including but not exclusively including the legal and consultation process and the implementation of signs and lines as required should the need arise as a consequence of this development.

The EDC is thanked for consulting the Borough Council.

Dated this 21st day of November 2023

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