

Application: 20230494
Your Reference: EDC/23/0066

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**
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**
Crete Hall Road
Northfleet
Gravesend
Kent

and being **EDC Consultation - Discharge of 31 (Mechanical Ventilation Heat Recovery System) pursuant to planning permission reference no. EDC/19/0049 in respect of apartments blocks A, B, C and D.**

Referred to in your application dated 10 May 2023.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

On the whole, the submissions are acceptable, and the recommendations should be implemented accordingly, but with regards to the MVHR system, there are certain matters that should be addressed before the system can be considered suitable to prevent an adverse impact on the occupants of the residential units. The EDC is requested to consider the recommendations from the Borough Council's Environmental Protection Officers:

Environmental Protection

These comments refer to the "Advisory Technical Note - Discharge of Condition 31 - Northfleet Embankment, East Crete Hall Road, Gravesend" by Bureau Veritas dated 25/05/23 for Ebbsfleet Development Corporation.

Noise

This service is happy with BVs approach and support their recommendations, inc. use of acoustic louvres to minimise noise ingress and the insulated Sentinel Kinetic system/ductwork to benefit from the reduced noise breakout and in-duct noise this affords.

Air Quality / Dust Nuisance

This service is satisfied with the approach from BV and support the recommendations of the Technical Note and would wish to see them implemented accordingly however the following additional comments need to be taken into consideration in this matter before the MVHR system can be considered suitable to prevent an adverse impact on the occupants of the residential units.

All blocks

Positive pressure - there is a lack of confirmation that the systems in all residential units will be set up to create a positive pressure which will help to prevent the ingress of nuisance dust and fine particles through openings into, and the fabric of, the building. The flow rates of each Sentinel Kinetic unit should be set up so that the intake flow is greater than the extract flow creating a positive pressure. The positive pressure is easily achieved and should be set up when the MVHR units are being commissioned. The commissioning report being provided to the LPA to confirm the MVHR units have been installed in all residential units and the flow rates for each.

Balconies and windows - The presence of balconies will encourage the opening of the balcony doors and for them to be left open. This is likely to impact the efficacy of the MVHR considerably while the doors are open. The windows are also openable which will also impact the effectiveness of the MVHR. As such the designers and installers of the systems need to ensure that firstly, the necessary flow rates, to ensure a positive pressure is created effectively enough to ensure dust and fine particles are not able to enter through the balcony doors and windows and secondly the MVHR can operate effectively to bring in clean air for the occupants with the windows and balcony doors open. This will be difficult to achieve but is especially important in the apartments facing the aggregate site. It is therefore recommended that the windows are not openable in these apartments so as to ensure the effectiveness of the MVHR and the prevention of nuisance dust in the apartments.

Passive Vents

To prevent the ingress of dust through passive vents in the building the use of them should be avoided in all locations.

Block A

Location of inlets on elevation facing primary source of dust - it is concerning that the inlets for the MVHR systems in the apartments facing the aggregate facility are on that elevation i.e. facing the primary source of particulate matter/dust from the aggregate importation facility. This needs to be addressed as the inlets to the MVHR should be positioned so as to prevent dust being drawn by the system into the apartments. These inlets should be relocated to an elevation that is not facing the aggregate facility or on to the roof. They should be located so as to limit the amount of dust being brought into the MVHR system from outside. If situated on a flat part of the roof they should be located so as to prevent the intake of heated air i.e. in a raised duct rather than flush with the roof surface.

BV has commented that consideration should be given to the height of the air intakes. The Technical Note makes reference to the inlets being at a height of 10.05m upwards and that it is feasible that the dust from the mounds could be drawn into the MVHR at a similar level. It is understood that the stacks of aggregate at the site are not permitted to be above 10m in height. However, it is believed that they have been well over that height in the past and may continue to be so. As such the relevant planning authority should be called upon to carry out enforcement of mound height restrictions as appropriate to help to avoid a detrimental impact on the development and in particular Block A.

It may be that inlets above 10m height will draw in less dust than inlets at a lower height. This should be researched and assessed through modelling by the applicant's air quality consultants if it has not been done so already.

BV's recommendation for the inclusion of appropriate filters in the system is supported and viewed as a necessity. However there also needs to be a strict regime in place to ensure that these filters are cleaned and or replaced in accordance with the manufacturer's instructions.

The EDC is thanked for consulting the Borough Council.

Dated this 29th day of June 2023

Address; Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Wendy Lane MRTPI
Assistant Director (Planning)
Planning Service