

Please ask for: Mr Michael Jessop
Our Ref: EDC/22/0139
Date: 5th September 2022



Sent by email only to:

planning.reps@gravesham.gov.uk

Ebbsfleet Development Corporation
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet
Kent DA10 1EE

Dear Ms Henry

GBC APPLICATION NUMBER: 20220852

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

PROPOSAL: Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

I write in response to your letter dated 15th August 2022 inviting the views of the Ebbsfleet Development Corporation (EDC) on the above Scoping Opinion currently under consideration by the Borough Council.

In terms of planning process and jurisdiction for determining planning application, whilst directly adjacent to the EDC's administrative area, it is evident that the land subject to the proposed development subject to this Scoping Opinion falls entirely within the planning jurisdiction of the Borough Council, as acknowledged in the Scoping Report. 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.

For the purposes of the EIA Scoping Opinion, as acknowledged in the Scoping Report, the Environmental Statement should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. This cumulative assessment is particularly relevant in this case due to the amount of approved and planned major development in the direct vicinity of the application site. As well as appreciating and assessing wider implications of the proposed developments and identifying appropriate mitigation, it would be necessary to understand how strategic mitigation such as health and education facilities would be delivered.

EDC comment that, from a population and human health perspective, deprivation of the surrounding area should be considered and any development proposals should seek to maximise benefits for local people including access to new employment opportunities and publicly accessible open spaces and community facilities.

In addition to the developments listed in Table 2 of the Scoping Report, the cumulative effects of the following developments within the EDC boundary (comprising land in both Dartford and Gravesham) should be included:

- Whitecliffe (Eastern Quarry) – Planning Reference 17/0048 (mixed-use development of up to 6,250 dwellings and up to 231,000 square metres of non-residential floorspace with associated infrastructure and open space);
- Ebbsfleet Green (former Northfleet West Grid Substation) – Planning Reference DA/05/00308/OUT varied by EDC/16/0045 (mixed-use development of up to 950 dwellings and non-residential floorspace for shopping, food and drink, hotel use; community, health, education and cultural uses);
- Former Croxton & Garry Site – Planning Reference EDC/17/0110 varied by EDC/19/0161 (residential development of up to 221 dwellings including new vehicular access);
- Ebbsfleet International Car Park D (HMRC Inland Border Facility) – approved as a Special Development Order (Statutory Instrument 2020 No.928);
- Rod End Estate - Planning Reference EDC/19/0069 (provision of industrial units with associated parking and access road);
- Bulk Powders Import Terminal, Northfleet Works - Planning Reference 20050561 varied by 20150634 and EDC/17/0008 (refurbishment and extension of the existing coal store for bulk cement and other powder storage);
- Bulk Aggregate Import Terminal, Northfleet Works – Planning Reference GR/09/0286 (bulk aggregates import terminal handling up to 3 million tonnes per annum and associated infrastructure including reinstated rail access);
- Berkeley Modular Housing Factory - Planning Reference EDC/17/0123 (development of a manufacturing facility for the production of modular housing with ancillary 2 storey office block and provision of a gate house, car parking and cycle storage) – constructed but not fully operational yet.

In addition to the above, a major outline planning application for mixed use development at Ebbsfleet Central East is expected to be submitted by EDC in September 2022. This site is owned by EDC and will be submitted by EDC. Ebbsfleet Central East is c.37 hectares in area and is located to the immediate south of the proposed Northfleet Harbourside application boundary, to the opposite side of the North Kent Railway Line and crosses the boundary between Gravesham and Dartford. Full details of the application, which will be accompanied by an Environmental Statement, will be available to view online following receipt and validation. This forms part of a wider site that was acquired by EDC in 2019 with the intention to bring forward comprehensive mixed use development in accordance with the existing and emerging Local Plan allocations. This includes land to the west of the High Speed 1 railway line that will not form part of this imminent outline planning application but which should be included in a cumulative assessment in accordance with the local policy allocation.

Table 2 refers to a pending decision on an outline planning application for residential led mixed use development on land adjacent to Northfleet Harbour at Grove Road in Northfleet (EDC application reference EDC/21/0102). This application was made by EDC who are the majority landowner for this site and, whilst it was formally withdrawn in August 2022, it is recommended that the effects of this previously planned development are factored into the cumulative assessment for resilience as it is an allocated site for development and has a sensitive interface with the proposed development at Northfleet Harbourside.

In terms of the proposed scheme, it is recommended that the application includes reference to, and

is informed by an understanding of, the Ebbsfleet Implementation Framework <https://ebbsfleetdc.org.uk/the-vision/> which sets out the vision and ambition for Ebbsfleet as endorsed by the Borough Council.

A key principle for EDC, as set out in the Ebbsfleet Implementation Framework and the Ebbsfleet Sustainable Travel Strategy, is the promotion of sustainable travel which should lie at the heart of new development, both in respect of the transport and movement aspects of the scheme but also the mix and scale of uses being proposed, to encourage local trips that are not reliant on the private car. Access and integration to existing public transport services is important, including both Fastrack and local bus services, as is dedicated pedestrian and cycle provision to facilitate safe and attractive alternative modes of travel. Consistent with development along Northfleet Embankment, 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 Thames Coastal Path. Pedestrian and cycle access to local destinations such as Ebbsfleet Station and Northfleet Station should form part of the proposals. Figure 6 excludes various PROWs within Northfleet that should be added.

Impacts on the local and strategic highway networks need to be considered and this would require careful consideration during the analysis of the traffic impacts of the development. The A2 Ebbsfleet Junction improvements have just been completed and were designed to accommodate the planned new development in and around Ebbsfleet, noting this did not anticipate the development proposed at Northfleet Harbourside. As above, it is recommended that principles of sustainable and active travel are embedded into the development from the outset to support transport modelling and trip rate assumptions to seek an appropriate balance between development viability and minimising impacts on the local and strategic highway network.

In terms of vehicle movements it would be necessary for the Environmental Statement to assess the cumulative impact of the development on the local highway network and the subsequent impact that the development, including any necessary mitigation, would have on the viability and deliverability of development sites within the EDC area. A key issue for EDC (as landowner and LPA) will be 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 land is safeguarded for potential future dualling of Thames Way, it would be necessary to consider effects on the viability of planned development at Ebbsfleet Central and on providing further severance between Northfleet and planned facilities and services within Ebbsfleet more generally.

The inclusion of a substantial quantum of retail and food and beverage floorspace (up to 32,000sqm) is noted, which appears to exceed a level of provision that would be required to meet the needs of the future residents and workers who will be occupying the development. It will be necessary for impacts on existing and planned retail centres, including the existing Hive Local Centre in Northfleet and the planned local and district centres at Ebbsfleet Central East, to be assessed and fully understood, noting concerns are likely should proposals unacceptably attempt to compete with established or planned retail centres in the surrounding area. EDC would welcome an opportunity to comment on the scope of a retail impact assessment in due course.

Due to the low lying nature of the proposed site and its location directly adjacent to the River Thames, as well as its interface with Northfleet Harbour and the culverted River Ebbsfleet, it is reasonable to expect that the scale and nature of development proposed has the potential for significant environmental effects in respect of water resources, flood risk and drainage. Whilst the expectation would be for this topic to be scoped into the Environmental Statement, this is a matter for the Borough Council to determine following input from organisations such as the Environment Agency and Lead Local Flood Authority. On a related point, and stemming from work undertaken by EDC in respect of proposals for the Ebbsfleet River Park as well as comments received from the Environment Agency and local people in response to proposals for development at Grove

Road, it is 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.

The provision of publicly accessible open space will be important 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, including the 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 Ebbsfleet Implementation Framework provides details of the vision for the river park which includes connections to and from Gravesend Town Centre.

An assessment on climate change, including the impact of the proposed development on climate change, is scoped into the EIA. A key aspect of this will be ensuring optimal environmental performance of all proposed buildings through a combination of factors including building fabric, design/orientation and means of energy generation, and we support this being scoped in.

The Scoping Report refers to the site being located within a Mineral Safeguarding Area but it does not appear to acknowledge that it comprises safeguarded mineral wharf infrastructure, i.e. Robins Wharf, the extent of which is identified as Site K in the Kent Minerals and Waste Local Plan (KMWLP) 2020. The extent of the aggregate facility shown in Figure 4, which does in part fall within the EDC boundary, does not appear to be correct. The Scoping Report refers to the proposed removal of the aggregate works so it is evident that the proposals would be in direct conflict with the presumption to safeguard the mineral importation facility so is an issue to be addressed as part of the application.

EDC are grateful for the opportunity to comment on this application and would ask to be formally consulted on future planning submissions for this land, both in our role as local planning authority and adjacent landowner.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Pulli', is written over a faint, diagonal watermark that reads 'Gravesend Local Planning Authority'.

EDC Chief Planning Officer