



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Regional Director South East
Operations Directorate
South East Region
National Highways
planningSE@nationalhighways.co.uk

To: Gravesham Borough Council – FAO Mrs Katherine Parkin
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20221064

Location: Land surrounding Ebbsfleet United Football Club, Stonebridge Road, Northfleet

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.

National Highways Ref: 96789

Referring to the consultation on a planning application dated 16 November 2022 referenced above, in the vicinity of the A2 at Ebbsfleet Junction that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) ~~offer no objection (see reasons at Annex A);~~

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to planningse@nationalhighways.co.uk.

Signature:



Date: 10 November 2023

Name: Nigel De Wit

Position:

Assistant Spatial Planner
National Highways

National Highways

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¹ Where relevant, further information will be provided within Annex A.

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A2 at Ebbsfleet Junction

We have had a positive ongoing dialogue with the applicant with a view to agreeing the impacts of the proposed development on the SRN.

Most recently, the applicant has prepared a Technical Note, received on 13 October 2023, alongside an updated Travel Plan, Parking Management Plan and a PowerPoint file, P05-RS-Strategic Link Flows.ppt, received on 12 October 2023.

We have reviewed this package of updated information in relation to the following matters:

- Residential Trip Generation
- Residential Parking
- Residential Mode Share
- Expansion of the Stadium
- Travel Plan

Matters in relation to the residential trip generation, residential parking and residential mode share are now satisfactorily resolved.

In relation to the stadium, the applicant has confirmed that a match day assessment has not been undertaken given that Ebbsfleet Football Club currently has permission for their stadium to accommodate up to 6,000 spectators. Rather than increase spectator provision to 8,000 at this time, the applicant commits to constrain the overall attendance to no more than 6,000 spectators to align with the current approved assessment until such time supplementary evidence and / or assessments of the impact on the Strategic Road Network, including the provision of any necessary mitigation has been submitted and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road). In addition, there is a need for a monitoring framework until such time supplementary evidence, assessment, and provision of any necessary mitigation in relation to the Strategic Road Network is agreed for occupation by over 6,000 spectators. We have agreed suitable planning conditions with the applicant in relation to the stadium.

Whilst certain items remain outstanding in relation to the Framework Travel Plan, we acknowledge that it is not always possible to be definitive at this stage in the planning process.

Accordingly, having assessed application 20221064 we are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (A2) provided that the following conditions are imposed, reflecting DfT Circular 01/22 and MHCLG NPPF 2021 (Para 110-113 tests).

Recommended Conditions

National Highways recommends that the following conditions are implemented within any planning permission granted:

1. Parking Management Plan

Condition

No part of the development hereby permitted shall be occupied until a detailed Parking Management Plan has been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road) and implemented. The development hereby permitted shall then be operated in accordance with the agreed plan. Details shall include (but not limited to):

- number of car parking spaces
- allocation of car parking spaces
- details of permit system
- parking restrictions
- enforcement
- monitoring and review

Reason

In order to minimise the use of the private car and promote the use of sustainable modes of transport in accordance with the National Planning Policy Framework (July 2021) and paragraph 40 DfT Circular 01/2022.

2. Full Travel Plan

Condition

The development hereby permitted shall not be occupied unless and until a comprehensive Travel Plan has been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road). The Travel Plan shall be prepared in line with prevailing policy and best practice and shall include as a minimum:

- the identification of targets for trip reduction and modal shift;

- the measures to be implemented to meet these targets including an accessibility strategy to specifically address the needs of residents with limited mobility requirements;
- the timetable/ phasing of the implementation of the Travel Plan measures shall be alongside occupation of the development and its operation thereafter;
- the mechanisms for monitoring and review;
- the mechanisms for reporting;
- the remedial measures to be applied in the event that targets are not met;
- the mechanisms to secure variations to the Travel Plan following monitoring and reviews

The development shall only be occupied in accordance with the approved Travel Plan which shall remain in perpetuity unless otherwise amended in accordance with a review to be agreed in writing by the Local Planning Authority in conjunction with the Highway Authority.

Reason

In order to minimise the use of the private car and promote the use of sustainable modes of transport in accordance with the National Planning Policy Framework (July 2021) and paragraph 40 DfT Circular 01/2022.

3. Stadium Expansion (1)

Condition

The Stadium shall not be occupied by more than 6,000 spectators until such time, based upon supplementary evidence and / or assessments of the impact on the Strategic Road Network, including the provision of any necessary mitigation, that occupation at over 6,000 spectators can be approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road).

Reason

To mitigate any adverse impact from the development on the A2 Trunk Road in accordance with DfT Circular 01/2022.

4. Stadium Expansion (2)

Condition

For the Stadium evidence of spectator attendance levels at events through ticket sales must be provided to the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road) through a monitoring framework on an annual basis until such time supplementary evidence, assessment, and provision of any necessary mitigation in relation to the Strategic Road Network is agreed for occupation by over 6,000 spectators.

Reason

To mitigate any adverse impact from the development on the A2 Trunk Road in accordance with DfT Circular 01/2022.

5. Construction Management Plan

Condition

Prior to the commencement of the development hereby permitted a comprehensive Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2 Trunk Road). The plan shall include as a minimum:

- Construction phasing
- Construction routing plans
- Permitted construction traffic arrival and departure times

Thereafter all construction activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highways Authority.

Reason

To mitigate any adverse impact from the development on the A2 Trunk Road in accordance with DfT Circular 01/2022.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.