

Reference: EDC/20/0080

Site Address: Land at Former Northfleet Cement Works, The Shore, Northfleet.

Proposal: Application for the partial discharge of condition 8 attached to outline planning permission reference no. EDC/16/0004 relating to a detailed Masterplan for the residential land.

Applicant: Bellway Homes Limited (Thames Gateway)

Parish / Ward: Northfleet North

SUMMARY

This application seeks approval of a detailed masterplan for the residential part of the wider Northfleet Embankment West site, pursuant to condition 8 of the outline planning permission.

The residential masterplan establishes “vision objectives” including creating a sustainable neighbourhood, reflecting and celebrating the site’s industrial heritage, creating a cohesive network of streets and open spaces, providing a range of new homes and creating a waterfront destination with connections to the River Thames. It adds detail to the outline approved parameter plans and provides commitments in respect of pedestrian, vehicular and public transport connections to and through the site in line with the Ebbsfleet Public Realm Strategy. It also addresses the type and location of public open spaces, housing mix, quality and tenure (including on-site affordable housing) and making most of views across the River Thames. The different character areas proposed would ensure a locally distinctive development reinforcing local character and heritage, consistent with the approach endorsed in the Design for Ebbsfleet Guide.

The masterplan carries forward commitments in respect of sustainable building design including incorporation of green/brown roofs on some buildings, electric vehicle charging (active or passive) across the whole scheme, sustainable drainage, water reduction and small-scale renewable energy generation. It also promotes sustainable travel measures in line with the Ebbsfleet Sustainable Travel Strategy.

Key strengths of the masterplan are the commitments to improving connections between the existing and new community, opening up access to the River Thames waterfront and providing a network of green open spaces currently lacking in this part of Northfleet.

It is relevant to note that 3no. aspects of the proposed masterplan deviate from the outline planning permission, namely the building heights to the south side of the proposed Fastrack corridor, the location of the community building and the approach to treating the College Road flint wall. These are discussed individually within separate applications but, in process terms, the ability to approve the masterplan is dependent on those 3no. amendments first being approved.

The masterplan has evolved well following positive discussions with the applicant at pre-application stage and post submission, with officers' advice underpinned by EDC design guidance documents which have been helpful. The masterplan scores well in the Building for a Healthy Life Assessment (11 greens and 1 amber) and is considered to comprise a comprehensive document that establishes an excellent basis to ensure the delivery of a

high quality residential scheme, albeit acknowledging that the detailed design stage would need to include further consideration to mitigating environmental constraints.

It is considered that the submission has successfully met the requirement of condition 8 in respect of a detailed masterplan for the residential land, sufficient to recommend partial discharge of condition 8.

RECOMMENDATION:

Partial discharge of condition 8 subject to:

- (i) Approval of s.96A application reference EDC/20/0078 (building heights); and
- (ii) Approval of s.96A application reference EDC/20/0075 (condition 40 re-wording – College Road flint wall); and
- (iii) Approval of s.96A application reference EDC/20/0077 (relocation of community building); and
- (iv) Imposition of the following informatives:

INFORMATIVES:

1. APPROVED DETAILS PURSUANT TO CONDITION 8

The following document is approved by this decision notice:

- Detailed Masterplan - Residential Scheme Written Statement Rev.C08 – BPTW dated December 2020

The following plans and reports were provided for information to support assessment of the application, and applicable content from these technical notes is incorporated into the approved written statement:

- Drawing No. EBR-BPTW-01-00-DR-A-0004-C04-A – Masterplan (Full Site)
- Drawing No. EBR-BPTW-01-00-DR-A-0003-C04-A – Masterplan (Part Site)
- Technical Note - Residential Masterplan – Ambient Air Quality and Dust Constraints – prepared by Stantec dated June 2020
- Technical Note – Acoustic Design Statement - prepared by Stantec dated 15th October 2020
- Technical Note – Acoustic Modelling of Proposed Residential Masterplan – prepared by Stantec dated December 2020
- Technical Note - Policy CS18 and Sustainability Strategy - prepared by Stantec dated 12th October 2020
- Technical Note – Response to Highways Comments - prepared by Stantec dated 4th September 2020
- Technical Note – Response to Highways Comments - prepared by Stantec dated 23rd October 2020
- Technical Note – Response to Highways Comments - prepared by Stantec dated 30th October 2020

- Technical Note - Policy CS18 and Sustainability Strategy - prepared by Stantec dated 23rd October 2020
- Harbour Village Residential Travel Plan - prepared by Stantec dated August 2020
- Travel Information Pack for Residents at Harbour Village – prepared by Bellway

2. EXTENT OF THIS APPROVAL

This decision notice relates to approval of the residential masterplan only, the extent of which is shown in the approved Written Statement dated December 2020. This decision does not confer approval of any details that may be included in the approved document for areas beyond the boundary of the residential masterplan as clearly established.

This decision refers to partial discharge of condition 8 as it does not include all land covered by outline planning permission reference EDC/16/0004 so it would be necessary for a further detailed masterplan to be approved covering all remaining areas within the red line boundary prior to submission of any application(s) for the approval of reserved matters relating to those areas.

3. TIMESCALES

As required by condition 3 of the outline planning permission, application(s) for approval of all Reserved Matters for the first phase of development hereby approved must be made to the Local Planning Authority within 2 years beginning with the date of the grant of outline planning permission. Applications for approval of the Reserved Matters for all remaining phases of development must be made to the Local Planning Authority within 5 years beginning with the date of the grant of outline planning permission, i.e. by 8th June 2023. It is hereby acknowledged that submission of a valid application for approval of all reserved matters for the first phase of development (Phase 1a) was made within the requisite timeframe.

Condition 2 of the outline planning permission requires development to be begun not later than three years from the date of the grant of outline planning permission, i.e. by 8th June 2021.

4. POSITIVE AND CREATIVE APPROACH TO DECISION MAKING

In accordance with paragraph 38 of the National Planning Policy Framework, Ebbsfleet Development Corporation, as local planning authority, has taken a positive and creative approach to the proposed development, focusing on finding solutions. The applicant engaged in extensive pre-application discussions and post-submission the applicant provided additional and amended information in response to concerns raised and recommendations made by the Local Planning Authority. The application was processed and determined in accordance with a Planning Performance Agreement.

1.0 SITE DESCRIPTION AND PLANNING BACKGROUND

Site Description

- 1.1 This application relates to part of the wider site known as Northfleet Embankment West which forms a substantial part of the Northfleet Riverside Strategic Development Area as identified in the Ebbsfleet Implementation Framework. The wider site comprises a former cement works site on the south bank of the River

Thames and includes Church Path Pit and Vineyard Pit located to the south and connected to the main site by road tunnels, approximately 31 hectares in area.

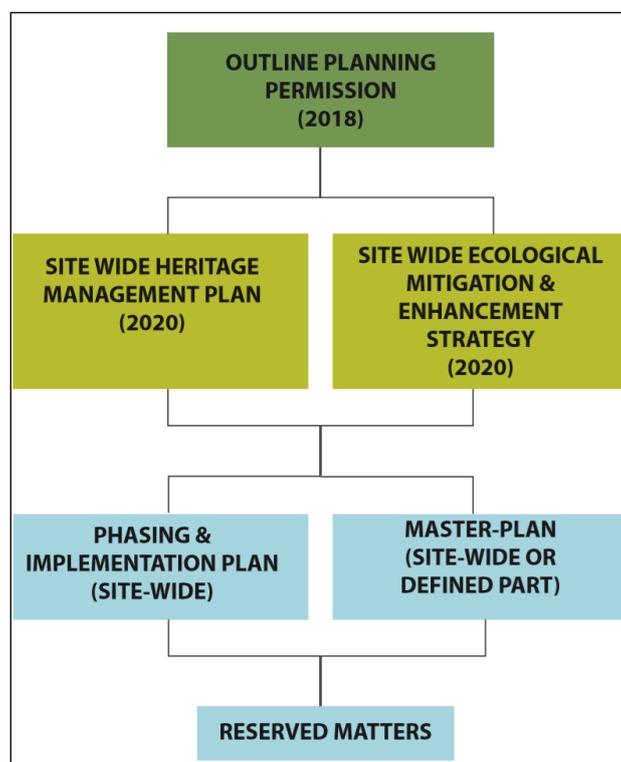
- 1.2 This application relates to the residential land which comprises the western part of the wider site and is approximately 12 hectares in area.
- 1.3 The residential land is situated between College Road to the west and a private commercial access road to the east, and straddles Hive Lane. The northern boundary is defined by the River Thames and to the south the site adjoins the existing residential buildings at The Hive. The site includes land to the north of Lawn Road located to the eastern side of the private commercial access road. The image below shows the boundary of this application in its wider context.



- 1.4 Vehicular access to the residential land is principally provided from Grove Road, College Road and Hive Lane, although these roads do not yet connect to or serve the land due to being cut off. An alternative route is available from Thames Way (the A226) along the private commercial access road that runs through Vineyard Pit via tunnels under the North Kent Line and Northfleet High Street. Pedestrian access is provided from the upper land level at Hive Lane and a number of public footpaths cross or run adjacent to the site.
- 1.5 The North Kent Line passes close to the site and Northfleet Station is located south of Northfleet High Street. Ebbsfleet International and Domestic Stations are also nearby, approximately 0.5km to the south of the North Kent Line.
- 1.6 The River Thames waterfront is formed of man-made flood protection walls. At the western end of the site the River Ebbsfleet enters the Thames via Robin's Creek, adjacent to Robins Wharf. Both Robins Wharf and the aforementioned 42 Wharf are safeguarded by the Kent Minerals and Waste Local Plan for their minerals function. Bevans Wharf located adjacent to the site is not safeguarded and is no longer operational.
- 1.7 The site lies within the Northfleet Industrial Air Quality Management Area.

Planning Background

- 1.8 Outline planning permission (reference EDC/16/0004) with all matters reserved was granted in June 2018 for a mixed use development comprising up to 532 residential dwellings, 46,000sqm of employment floorspace, a neighbourhood centre with retail units and a community centre and riverside pubs and restaurants. The permission was accompanied by a s.106 Agreement. The land was subsequently put up for sale by Northfleet Property LLP (the landowners at the time of the application) and is now in dual ownership. The land approved for residential development was purchased by Bellway Homes in early 2020 and the remaining employment land is owned by NPLLP who were acquired by NWM Investments.
- 1.9 The outline planning permission is tiered and requires approval of particular documents prior to being able to move onto the next stage. This structure of the outline permission is shown below as it is necessary to appreciate this to understand where this current application fits into this process.



Structure of the Outline Planning Permission

- 1.10 A Heritage Management Plan and an Ecological Mitigation and Enhancement Strategy were approved in April 2020 and May 2020 respectively.

2.0 PROPOSAL

- 2.1 This application seeks approval of a masterplan for the residential land only (i.e. excluding the employment land) pursuant to condition 8 of outline planning permission reference EDC/16/0004.
- 2.2 Accordingly this application seeks partial discharge of condition 8 as it cannot be fully discharged until a detailed masterplan for the remaining parts of the wider site

(including employment floorspace and food and beverage floorspace) is submitted for approval at a later date. Condition 8 allows for approval of a residential masterplan independent of a masterplan(s) for the remaining uses.

2.3 Following minor changes to the wording agreed in 2019, condition 8 reads as follows:

Prior to or at the same time as a submission of the first Reserved Matters application pursuant to condition 2, a detailed Masterplan(s) for the site based on the approved drawings listed in condition 4, the documents approved pursuant to condition 6 and consistent with the phases of development, shall be submitted to the Local Planning Authority. The detailed Masterplan shall thereafter be approved in writing by the Local Planning Authority prior to or at the same time as approval of the first Reserved Matters application. The detailed Masterplan(s) shall be submitted for the whole site or for a defined part of the site to be approved in writing by the Local Planning Authority, based on the phases to be approved pursuant to condition 7. The detailed Masterplan(s) shall be based on a 1:1250 scale plan(s) and shall be supported by a written statement. Any replacement Masterplan(s) which shall from time to time be produced shall also be submitted to and approved in writing by the Local Planning Authority. It shall include consideration of and detail of the following matters:

Land Uses

- (a) Land use disposition including floor space areas*
- (b) Broad mix and type of housing, including approximate density and indicative distribution of affordable housing*
- (c) Response to environmental constraints, including noise*
- (d) Location of neighbourhood centre, including the community centre*

Open Spaces

- (e) Indicative locations of all areas of public open space, comprising not less than 3.5 hectares to include, but not limited to, a riverside promenade, a junior playing pitch, a mixed use games area, a heritage park and a combined locally equipped area of play and neighbourhood equipped area of play*
- (f) Biodiversity measures consistent with the Outline Ecological Mitigation and Enhancement Strategy*

Form of Development

- (g) Form of development and design*
- (h) Unifying elements of design*
- (i) Integration (through design) between the residential and employment land*
- (j) Building heights consistent with the outline parameters*
- (k) Architectural style and treatment of the buildings*
- (l) Building materials palette including incorporation of flood resilient and resistant materials where appropriate*
- (m) Location of landmark buildings and creation of vistas through the site to and from the River Thames*
- (n) Cross sections and perspectives of key streets, buildings and open spaces*
- (o) Building and renewable energy technologies*

Access and Car Parking

- (p) Principal routes (vehicular, public transport, pedestrian and cycle) and connections to surrounding area, including public footpaths*
- (q) Dimensions and alignment of Fastrack bus corridor*
- (r) Access and car parking, including emergency access from Church Path Pit*

Public Realm

- (s) *Locations of public art*
- (t) *External lighting and riparian life-saving equipment*
- (u) *Surface materials palette and street furniture, including signage*
- (v) *Hard and soft landscaping*
- (w) *Treatment of frontages*

Levels

- (x) *Land forming and finished levels*
- (y) *Water management and drainage*

Archaeology/Historic Environment

- (z) *Identification of areas of archaeological importance and those areas where remains are to be preserved in situ.*

The details submitted pursuant to condition 2 for any part or phase of the development shall generally accord with the detailed Masterplan relevant at the time of submission.

- 2.4 The application is submitted in the form of a written statement comprising a combination of images and text, along with a series of supporting documents and plans.

3.0 RELEVANT PLANNING HISTORY

- **EDC/16/0004** - Outline application for a mixed development and comprising up to 532 dwellings, up to 46,000 sqm employment floorspace, mixed use neighbourhood centre comprising up to 850 sqm retail/cafe/takeaway floor space, community centre, riverside food and drink uses comprising up to 500 sqm of pub or food and drink uses, public open space including riverside promenade, public park with equipped play areas and playing field with shared public/school use, multiuse games area and wildlife corridors and Fastrack link to provide a segregated link across the site along with Fastrack stops. Approved on 8th June 2018.
- **EDC/19/0124** - Application for non-material amendments to conditions 7 and 8 of outline planning permission reference no. EDC/16/0004 to allow submission of the Phasing and Implementation Plan and Detailed Masterplan for approval either prior to or at the same time as submission of the first Reserved Matters application. Approved on 8th August 2019.
- **EDC/19/0177** - Request under Section 106A of the Town and Country Planning Act 1990 (as amended) to modify a planning obligation in respect of use of the access tunnels to serve the residential and mixed use areas of the development approved by outline planning permission reference EDC/16/0004. Deed of Variation agreed and completed on 14th January 2020.
- **EDC/19/0201** - Application for the discharge of condition 6(a) attached to outline permission reference no. EDC/16/0004 relating to a site-wide Heritage Management Plan. Approved on 17th April 2020.
- **EDC/19/0202** - Application for the discharge of condition 6(b) attached to outline planning permission reference no. EDC/16/0004 relating to an Outline Ecological Mitigation and Enhancement Strategy. Approved on 21st May 2020.

- **EDC/20/0075** - Application for non-material amendment to outline planning permission reference EDC/16/0004 to alter the wording of condition 40 in respect of the College Road flint wall. Pending decision.
- **EDC/20/0077** - Application for non-material amendment to outline planning permission reference EDC/16/0004 to allow for the relocation of the community facility involving (i) change to description of development, (ii) changes to the wording of condition 4 to replace the Land Use and Development Framework Parameter Plans and (iii) changes to wording of condition 14. Pending decision.
- **EDC/20/0078** - Application for non-material amendment to outline planning permission reference EDC/16/0004 to amend the wording of condition 4 to replace the Building Heights Parameter Plan to allow for an increase in the maximum height of buildings in one location within the residential part of the site from 3 storeys to 4 storeys. Pending decision.
- **EDC/20/0084** – DUPLICATE APPLICATION - Application for the partial discharge of condition 8 attached to outline planning permission reference no. EDC/16/0004 relating to a detailed Masterplan for the residential land. Pending decision.

4.0 PUBLICITY

4.1 Due to the nature of this application which relates to masterplan principles for the residential part of the site and that interacts with existing residential, industrial and commercial premises, formal publicity was undertaken as follows, advertising the proposal as development affecting a public right of way:

- Neighbour notification letters (to 224no. addresses)
- Press notice
- 6no. site notices

4.2 The application was also included on EDC's weekly list of planning applications.

4.3 In addition to notifying the Northfleet North ward councillors, the following local groups, organisations and businesses were notified:

- Northfleet Harbour Restoration Trust
- Northfleet Big Local
- No Walls Gardens
- Council for Voluntary Service, North West Kent
- South East Baptist Association
- Romani, Czech, Slovak Support Project
- Hive Hope Foodbank
- The Hive Library
- St Botolph's Church
- Huggen's College
- Aggregate Industries

4.4 Following receipt of updated information in September 2020 a further round of publicity was undertaken comprising publication of a press notice and display of site notices.

- 4.5 This was in addition to the public consultation undertaken by Bellway Homes that ran between April and May 2020, the feedback from which is set out in the applicant's Statement of Community Involvement that accompanies this submission.
- 4.6 At the time of publishing this report **5no. written representations** had been received, 1no. of behalf of the local ward councillors and 4no. from an adjoining landowner, as follows

Northfleet North Ward Councillors Sullivan, Scollard and Singh (1no.)

Object to the application, comments applicable to this application summarised below (full response in Appendix 1):

- Perceived low level of public consultation and engagement;
- Concerned re. proposed relocation of the community centre;
- Concerns re. construction access from Hive Lane and College Road;
- Must provide sufficient parking to avoid further pressure on parking in existing area;
- Pleased the scheme will provide on-site affordable housing, but they must provide a range of sizes, be tenure blind and be available for local people;
- Note that the scheme provides green spaces and a route to the waterfront, but consider it necessary for the play park to be co-designed with existing residents;
- Need a commitment to local labour and youth and re-training apprenticeships for local people and engagement with local schools and colleges;
- Welcome playing pitch for the school but note this can be a financial liability, so seek confirmation that EDC would assist if required and question what covenants could be put in place to ensure reasonable public access is provided;
- Community engagement and responsiveness to concerns will be fundamental to integrating communities, including considerate construction activity during the long build programme; and
- Questions what provisions are included to make the scheme as carbon neutral as possible.

Adjoining Landowner – Tarmac (4no.)

As an adjoining landowner, Tarmac were notified of the application and the following comprises a summary of the representation submitted on their behalf:

Tarmac remind all parties that it controls land immediately east of the wider application site and although it has no land directly bordering the proposed residential area it retains access rights through to the main access tunnels onto Thames Way. Tarmac operates a Bulk Powders Import Terminal (with active use of 42 Wharf) and a rail siding, alongside temporary uses including the Packing Plant. Tarmac welcomes the potential redevelopment of a long-promoted scheme and wishes to take a collaborative approach to resolve key queries both through these and future applications.

Despite initial objections, Tarmac confirm **no objection** to the application provided that the Local Planning Authority is comfortable with the issues it is obliged to consider under the NPPF in the context of a residential scheme of this nature and in this vicinity. This includes being satisfied that issues previously raised by Tarmac

have or will be addressed, in respect of noise impacts, Fastrack corridor, extent of the riverside promenade and the listed Bevan's war memorial.

This final position was confirmed following a meeting between parties in November 2020 and confirms that Tarmac are comforted by the commitment of the applicant to undertake further noise assessment work. Tarmac acknowledge that the revised masterplan addresses some of their initial comments in respect of its boundary and inaccuracies in respect of alignment of the Fastrack corridor.

5.0 CONSULTATION

5.1 The following consultees and external organisations were consulted on this proposal and their comments are summarised below:

Gravesham Borough Council (GBC) – GBC comment as follows, comprising responses from different teams within the Borough Council:

GBC New Homes Development and Strategy Manager (Affordable Housing)

- GBC note that the masterplan confirms provision of 30% affordable housing on site in line with option 1 of the s.106 with a tenure split of 60/40 in favour of Intermediate Housing in line with the s.106 which equates to the provision of 160 affordable homes across the site.
- GBC note the s.106 requirement that, as part of submission of Reserved Matters applications for any development phase, an affordable housing scheme must be submitted in writing to the EDC for approval in consultation with Gravesham Borough Council.
- GBC would prefer to see more pepper-potting of the affordable dwellings and add the following general comments:
 - Prefer not to see full length windows to bedrooms within affordable rented dwellings as, from experience, when households on low incomes are moving into what may be their first independent home the cost of window dressings to ensure privacy for such large windows is often prohibitive; and
 - Careful consideration of balcony treatments is required across the scheme as misuse of balconies can become a housing management issue and also undermine the impression of the overall development.

EDC Officer Comment: The commitment to provision of on-site affordable housing is acknowledged, and discussed further at paragraphs 7.14 and 7.15 of this report.

GBC Regulatory Services (Environmental Health)

- As delivery of the employment development is not guaranteed, GBC do not feel that its presence could be accepted as a means of noise mitigation for the residential development, nor would it be reasonable to expect residents in the new development to have to live with any unacceptable noise impacts in the interim.
- Statutory nuisance action can only be applied where the source of the noise is caused by an unreasonable act. Given the character of the existing locality and a number of other factors, GBC do not consider that statutory nuisance intervention would be available for disturbed residents, leaving them with no viable way to tackle any such disturbances.
- The potential noise impacts from the protected wharf operations are of concern as the wharf can operate 24/7 and has potential to generate low frequency noise, which is not easy to control. Whilst the Acoustic Design Technical Note makes

reference to there not being unacceptable noise impacts to residents located within 250m of such operations, low frequency noise can travel beyond this, behave in unpredictable ways and cause those experiencing it significant troubles. It is not likely that such noise could be dealt with by statutory nuisance legislation and so it is important to ensure this will not be problematic via the planning process. GBC suggest that including a proactive assessment of low frequency noise at the site in the proposed noise impact assessments would certainly be prudent, and note that this is acknowledged in the submission.

- In areas where noise levels are such that internal noise levels rely on windows being closed, the developer should ensure that affected dwellings have other means of clean, fresh air ventilation all year round to avoid the need to open windows, as acknowledged in the submission.
- GBC agree that BS4142 and BS8233 are expected to be considered as a minimum. It notes that "Alternative standards may be used if the measurements of the sound sources indicate that this would be appropriate" but GBC query whether this would be adequate and question who would determine what is appropriate. GBC advise that single noisy events should refer to WHO guidelines and, as mentioned above, low frequency noise requires consideration.
- GBC acknowledge that noise is certainly a concern but also that it is not possible to assess the impacts until such time as a suitable noise impact assessment and associated acoustic mitigation scheme are provided. GBC comment that internal noise can usually be mitigated, but protecting external amenity space is more difficult. In any assessment, GBC advise that mitigation should not be reliant on screening from development that is not already in place or that would not form part of the same development.

Following review of the additional noise assessment, GBC's EHO advises that if the external amenity areas are not predicted to exceed 55dB in the worst case scenario then they would not have an issue with that element of the proposal as that is the correct maximum level to apply. However, the relevance of BS4142:2014 in the assessment is questioned as the limit is derived from the WHO guidelines for community noise and is absolute, i.e. it does not relate to a comparison of rating noise and background as in BS4142. It is also noted that it is based on 11 year old data and unseen/untested calculations which do not account for tonality or impulsivity of noise. GBC note that that this is only at masterplan stage and that a more detailed noise assessment will be provided in due course.

EDC Officer Comment: Although limited in its scope, the additional noise assessment supports the acoustic noise report and the assessment made at outline stage and provides further reassurance at this stage that noise can be adequately mitigated, even in the absence of a noise barrier provided by the employment buildings.

GBC Highways Development Management Officer

- Fastrack should be delivered in one phase at the start of development and needs its own suitably sized corridor for its sole use, although other corridors can parallel it such as a cyclist route.
- The misjudgement of car parking provision can result in either a heavily congested area with car parking at a premium which often results in inconsiderate and dangerous parking to the detriment of highway safety. Over provision can result in the poor use of space which can be used for other purposes. The KCC Interim Guidance Note 3 car parking requirement should be met in full, but in such a way that once actual car parking requirements become established over the first three years of occupation, the provision of street car

parking can be reviewed. It is better to overprovide initially and remove later if not required.

- Whilst the reduction in the over dominance of vehicle routes may be appropriate, they must be fit for purpose with due regards to all traffic that may use them particularly pedestrians.
- Street planting must not obstruct sight lines or street lighting.
- The draft Travel Plan encourages online shopping but no provision is made for the safe parking of the delivery vehicles particularly on the Fastrack corridor, which could result in delays and deter people from using public transport.

EDC Officer Comment: The timescale for delivery of the Fastrack route is subject to assessment pursuant to a separate condition (condition 7 – Phasing and Implementation Plan). The Ebbsfleet Sustainable Travel Strategy has been endorsed by GBC so this is the appropriate document to be referring to when establishing expectations and negotiating in respect of sustainable travel measures and car parking levels. The updated masterplan now commits to the provision of service bays along the Fastrack corridor. The Travel Plan is submitted for information only, not for approval at this stage.

GBC General Comments

- The overall layout and density appears to be appropriate to the context.
- GBC express concerns over re-locating the community centre and the apparent absence of the original proposal for a café/restaurant within the riverside park.
- The development should be driving up the green credentials on the site including the extensive use of PV panels.
- The images appear to show the use of Bevans Wharf within the development in connection with potential mooring facilities, but this is outside of the red line boundary of the application site. The Borough Council would nevertheless support and encourage proposals for bringing back the wharf/jetty into a positive use to enhance the overall development.
- The masterplan includes a Public Art Strategy but there is little substance as to how this will be incorporated within the overall development.

EDC Officer Comment: The pros and cons of relocating the approved community centre is covered by separate report reference EDC/20/0077 but an overview is provided at paragraph 7.17 of this report. The outline permission allows for the provision of 500sqm of food and drink uses along the riverfront, but on land that falls outside the boundary of this residential masterplan – this floorspace would form part of the separate employment masterplan. Details regarding sustainable energy and carbon reduction are discussed in paragraphs 7.85 to 7.98 of this report. Bevan's Wharf was included for illustrative purposes only, and details have been removed from the updated masterplan document. In respect of public art, the masterplan approach is to embed heritage into the public realm and the three main parks, which is potentially more sustainable and engaging than a piece of art work such as a sculpture. That said, redevelopment of the wider site does present opportunities for sensitive relocation of the listed Bevans war memorial and Sphinx statue.

Environment Agency – The EA support the application and recommend partial discharge of condition 8.

Flood Risk

The EA advised that future the flood defence crest level at this location is 8m AOD by the year 2070, based on a new Thames Barrier at Long Reach which is the current front runner option. The future defence level is based on a future flood level of 7.29m

AOD plus 0.7m of freeboard to address uncertainty. The EA are currently re-modelling the flood levels for the Thames Estuary as part of the 10-year review of the Thames Estuary 2100 plan, but results from that study will not be available for a number of months.

The EA welcome the offsets proposed between the River Thames and Robin's Creek and the nearest buildings. Following ongoing dialogue, the EA agree revisions to the masterplan which commits to raising the development platform to 8m AOD to create a continuous retreated line at that level that would remove the need for future defence raising and thereby preserve the open character of the Riverside Promenade over the long term.

Ecology

The scheme provides biodiversity enhancements along the frontage in the form of a SUDs feature and proposed planting, but it is disappointing that it provides no estuary edge enhancements for the River Thames. The EA would need a full planting list for the purposes of any Flood Risk Activity Permit, and would expect the riverside and SUDs features to comprise native species that reflect the estuarine environment. The EA note that the proposals suggest that more enhancements could be achieved on the jetty, but comment that it isn't clear what is thought possible on this. Further enhancements such as cladding on the existing wall would provide both an aesthetic and ecological betterment in the absence of the creation of tidal terraces.

EDC Officer Comment: The masterplan has been amended to commit to raising site levels along the riverfront to build in longer term flood protection mitigation, which would remove the need for future defence raising and thereby preserve the open character of the riverside promenade over the long term. In respect of ecology, landscaping is a reserved matter and is expected to enhance biodiversity as per the approved outline Ecological Mitigation and Management Strategy.

Port of London Authority (PLA) – Following review of the amended documents, particularly the Acoustic Design Technical Note, the PLA confirm that it has no in principle objection to the partial discharge of condition 8.

However, it must be clear as part of the forthcoming detailed planning applications for the development that, in line with Policy DM8 of the adopted KMWLP the detailed design issues, robust noise assessments and appropriate mitigation measures are fully set out, including as part of the need to discharge condition 9(b) of the outline permission, which sets out the requirements for the details of noise attenuation measures required to mitigate the effects of surrounding industrial and traffic sources of noise on the proposed development to be provided for approval as part of reserved matters stages. This would be in line with the 'agent of change' principle to ensure that the long-term viability of the nearby safeguarded wharves are not detrimentally affected by the proposed development.

The PLA advise that the future noise monitoring is undertaken in consultation with the nearby wharf operators, to confirm the operations which are expected to take place during the monitoring period. The noise monitoring must take place during a usual week of work at the wharves, including times when vessel movements and deliveries are taking place across a 24-hour period to ensure an accurate noise assessment. In addition, as part of the noise assessment the PLA would expect that both BS 8233 (Guidance on sound insulation and noise reduction for buildings) and BS 4142 (Methods for rating and assessing industrial and commercial sound) are

used in order to ensure that the noise from the nearby safeguarded wharves are fully considered.

The masterplan refers to the potential for accessibility to the Northfleet Harbour area, located to the west of the proposed development to be enhanced, noting that the area also provides a potential opportunity to introduce a sports and leisure offer, as well as retail and active frontages along the quayside. Whilst the PLA is supportive in principle of enhancing the creek/harbour area, which would broadly be in line with the PLA's Thames Vision, the PLA must be consulted on any detailed proposals as they come forward, particularly if these include any river-based activities. As part of the proposals included as part of this application adjacent to the Northfleet Harbour, it must be ensured that the walkways are appropriately designed and include the provision of appropriate riparian lifesaving equipment.

The PLA welcome that the masterplan includes a specific reference to the need to include appropriate riparian life-saving equipment (such as life buoys, grab chains and escape ladders) along the river edge. The detail of this required infrastructure must be set out in the applicable reserved matters application(s). In addition, the PLA considers that as part of this the applicant must also give consideration to the provision of appropriate suicide prevention measures (such as CCTV, appropriate designed fencing and signage with information to access support). This would be supported by the Drowning Prevention Strategy (2019) produced by the Tidal Thames Water Safety Forum (including the PLA, RNLI and emergency services).

The PLA advise that the masterplan is unclear in respect of proposals for Bevans Wharf, but advise that any temporary and/or permanent works to the wharf may require a River Works License.

The PLA welcomes that minimal lighting is proposed along the embankment area to ensure no light spill into the River.

As part of future Reserved Matters applications with regard to condition 16 of planning permission EDC/16/0004 the PLA considers that an amended Transport Statement is provided which shows that the applicant has given full consideration to the use of the River Thames as part of the construction stage of the proposed development, either directly to the site or through the supply chain via a neighbouring operational wharf. This would align with the PLA's Vision for the Tidal Thames which includes the goal to see more goods and materials moved on the river.

EDC Officer Comment: The relationship between the residential development and adjacent safeguarded minerals infrastructure is discussed in paragraphs 7.19 to 7.27. The CEMP (condition 16) is required to consider measures to maximise sustainable import/export of goods and materials during construction, including use of the River Thames if feasible. Bevans Wharf does form part of this masterplan and is outside the control of the applicant. The outline planning permission does not require any works to the redundant wharf.

KCC PROW – Public Footpaths NU3, NU6, NU42, NU7 and NU7A pass through the boundary of the wider application site and their existence is a material consideration.

Following previous comments, the applicant engaged with KCC and amended their proposals and the latest plans have addressed their primary concerns, showing how the PROW network would be integrated within the proposed development site. KCC acknowledge that the applicant has indicated that they will apply to divert and extinguish public footpaths affected by the development which should help to

address long term PRow alignment issues in the area and provide a coherent network for the public to use. KCC advise the applicant to submit their application for these network changes as soon as possible, so that an alternative approach can be agreed in the event of the application being unsuccessful.

The latest masterplan shows the new 'internal route' through Bevan's Park would connect with the definitive alignment of public footpath NU42 along Lawn Road. The applicant has confirmed this in conversation with KCC and confirmed that landscaping works would be completed at the site to address the current variation in height levels, with these details to be provided at the reserved matters stage.

The applicant has also acknowledged the existence of the England Coast Path on the revised plan, showing how the National Trail could be accommodated within the site. It is understood that the applicant will contact Natural England and seek a Variation Report for the Coast Path, with the intention of diverting the Trail along the new riverside Promenade. These proposals are welcomed and supported.

EDC Officer Comments: These comments reflect ongoing positive engagement between parties to agree a mutually acceptable position having regard to current alignments and constraints provided by site topography. However it would remain necessary to obtain formal diversion orders through a separate process.

KCC Highways – KCC raise no objection to the revised masterplan from a development planning perspective.

KCC comment that the Fastrack provision on this site is of utmost importance and is key to delivering the sustainability of the site. KCC consider it disappointing that a segregated Fastrack route is not proposed through the site but support the dimensions proposed for this corridor.

The submission does not provide information demonstrating the dimensions and alignment of the Fastrack route through the eastern part of the site. This connection is key to providing a Fastrack route through Northfleet Embankment and the connection via the plaza should be a smooth transition and all pinch points must be avoided. The layout must be tracked for a 12.2 metre electric bus which is to be used from 2022.

KCC do not accept unnecessary delays on the Fastrack network, as if journey times increase patronage will be affected. Accordingly, KCC raised concerns in respect of the proposal to require refuse and service vehicles stopping along the Fastrack road. However, KCC confirm this concern has been addressed by the updated masterplan which commits to the provision of service laybys, the details and location of which can be resolved at reserved matters stage.

KCC welcome that the Hive Lane proposals now include a cycleway, but advise that the Hive Lane typology should increase the carriageway width to 6.5 metres, and that car parking bays should be 2.5 metres wide to avoid any overhanging vehicles. KCC will not adopt roads which can cause inappropriate car parking on the highway but accept this could be resolved at reserved matters stage as appropriate. KCC advise that an assessment of the existing highway network within Hive Lane must be carried out to ensure the route is appropriate for the increased movements of all users of the highway when the detailed designs are taking place, and note that the existing Hive Lane arrangement may be subject to improvements to tie the new infrastructure into the existing network. KCC agree that the detail design of the crossing points will be considered as part of the reserved matters application.

KCC accept that the detailed design detail of College Road can be finalised at the reserved matters stage, but welcome a shared space and mews style street approach.

Whilst KCC appreciate the current guidance and push for EV charge points, it is not within KCC policy to allow for the charge points to be located within the adoptable highway. KCC therefore recommend that the applicant considers providing a charging hub within the site which could be privately managed. This space could be re-purposed in the future if space for car parking needs to be reallocated. KCC advise that EV charge points must be provided by the applicant at the individual residential units and not retrofitted. All EV chargers provided for homeowners in residential developments must be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection).

KCC acknowledge that the EDC car parking provision for a 'highly accessible area' is acceptable in this location. However, this is dependent of delivery of Fastrack so this would need to be reviewed depending on the timescale for the Fastrack delivery. KCC welcome proposals to provide a car club and recommend that residents should be offered one year's free membership to encourage take up, but query how realistic it is to expect parking bays to be "re-purposed" in the future.

KCC comment that arrangements for car parking to serve the proposed sports pitch has not been provided.

KCC comment that car parking located within the adoptable highway cannot be allocated. Paragraph 2.24 refers to a visitor permit scheme which will need to be developed with Gravesham Borough Council. I note that there are restrictions in the local area already. However, a visitor scheme sounds inconvenient for residents and I am unsure how this would work. The permit system would need to be controlled to ensure residents do not use the permits themselves.

EDC Officer Comments: Transport matters are discussed in paragraphs 7.49 to 7.79 and the scheme is considered to align with guidance in the Ebbsfleet Public Realm Strategy and the Ebbsfleet Sustainable Travel Strategy. Notable improvements relate to street and parking typologies, EV charging strategy and service bays.

KCC Heritage – KCC very much welcome the strong commitment throughout the Masterplan documentation to the importance of the site's rich industrial heritage. It should also be remembered that the site has pre-industrial heritage, in particular for evidence of the ice age environments of the former River Thames and these other aspects of the historic environment of the area will also need to be recorded and communicated. The Heritage Management Plan approved under Condition 6(a) provides the mechanism to ensure that these needs are met as detailed design elements are developed.

The Statement of Community Involvement reinforces the evidence for the local interest in the history and archaeology of the area and the need for the development to deliver on recording information appropriately, reflecting the heritage (including new information and discoveries) in the final design and layout and disseminating new knowledge to residents and visitors. The development of the website is welcomed, and it will be good to see the context expanded to provide access to a full range of information about the historic environment of the site. KCC would envisage this website providing access to all the information about the cultural heritage of the site and surroundings with access, for example, to pdf documents and/or links to

other websites with further information. This should be an area where the applicant can work with local heritage groups to help develop the website and the range of information it could provide and to ensure that it will remain a legacy of the development.

KCC welcome the flexible approach being taken to design along College Road which will allow for agreement on detailed house and street design before the dismantling and re-purposing of flint in the College Road wall.

EDC Officer Comments: No comment.

KCC Ecology – KCC have compared the submitted documents with the approved site-wide Outline Ecological Mitigation and Enhancement Strategy and advise that they are satisfied that the masterplan reflects the Ecology Constraints and Opportunities Plan and demonstrates that habitat creation/features will be implemented as part of the proposed development. KCC acknowledge that ecology is adequately addressed throughout the masterplan including overlap with sustainability (i.e. green and brown roofs) and the lighting strategy (i.e. areas of ecological sensitivity and dark corridors). KCC welcome the commitment that bird and bat boxes would be integrated into the building design, to ensure they are retained in the long term.

EDC Officer Comments: No comment.

KCC Minerals – KCC advise that the applicant's submission has the potential to adversely affect the continued lawful operation of two safeguarded wharves in Kent, namely:

- Robins Wharf to the west of the application site and within 250m of the proposed development
- Wharf 42 to the immediate east of the development and with a proposed access way bisecting the safeguarded area of the wharf

In response to their original comments KCC acknowledge that the masterplan has been amended to consider both the potential adverse effects on the future occupants of the development under consideration from noise and dust impacts from, amongst other matters, the continued lawful operation of safeguarded mineral infrastructure that is situated nearby.

The acoustic and dust impact statements can be considered as being sufficiently detailed in content that it can be said the submission of the masterplan to partially discharge condition 8 of planning permission EDC/16/0004 has considered the necessity to address the safeguarding of the mineral infrastructure at the masterplan level, with the conclusion that these impacts can be adequately mitigated. It is the case, however, that when detailed planning applications are submitted to fully develop the site with both residential and commercial development then detailed Infrastructure Assessments should be provided to fully investigate the safeguarding matters as detailed in adopted KMWLP Policy DM8 (Safeguarding Minerals Management, Transportation, Production & Waste Management). Where detailed design issues and other mitigation measures of both the structures, their orientation and uses and other land under the control of the applicant to effect mitigation measures should be explored to ensure that the continued lawful operation of the safeguarded site is not compromised into the future. Thus, maintaining the County's ability to maintain a steady and adequate supply of minerals and mineral related products.

EDC Officer Comment: The relationship between the residential development and adjacent safeguarded minerals infrastructure is discussed in paragraphs 7.19 to 7.27.

KCC Lead Local Flood Authority – The written statement includes a section with respect to Water Management and Drainage which indicates that the outlet for drainage from the development would occur to Robins Creek and includes a description of the wider drainage strategy.

KCC encourage the inclusion of surface solutions for surface water management which offer wider multi-functional benefits, for example through the inclusion of rain gardens, swales and street trees. At present these are not fully demonstrated within the layout as submitted; however, it is a matter for the LPA to determine whether these can be confirmed at later stages of planning for subsequent phases. KCC note that the applicant's drainage consultant has stated that local surface water management approaches, such as swales and rain gardens, would depend on the underlying soil conditions which will be established once earthworks commence.

KCC have no objection to the approval of the layout and offer no further comments.

EDC Officer Comments: The masterplan does not fix the proposed layout, as that would be confirmed at reserved matters stage, and a planning condition was imposed on the outline planning permission requiring approval of a detailed surface water drainage scheme prior to commencement of development. The masterplan includes provision of sustainable drainage features to be explored further at detailed design stage.

Kent Wildlife Trust – No response received.

Kent Police Crime Prevention Design Advisor – Kent Police refer to the NPPF which states that planning decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. The following detailed comments are provided:

1. The use of the Secured By Design (SBD) initiatives are recommended.
2. Full audio visual door entry and access control measures systems should be installed for any blocks of flats 4 units or more, as detailed in SBD Homes 2019. Secure mail delivery, bin and cycle storage will need to be considered.
3. The locally equipped area of play and neighbourhood equipped area of play should be fenced with a low level (1.1m) fence with automated closing gates, to deter dogs and other animals.
4. Entrance and exit door sets, including any patio door sets, should be certified to PAS24:2016 as per SBD Homes 2019 guidance.
5. Windows should be certified to PAS24:2016 as per SBD Homes 2019 guidance, this includes any easily accessible window, e.g. above any flat roof porches.
6. Alarms - CPDA recommend the installation of a fused alarm spur for each house, if an alarm system is not installed.
7. Rear parking courts should be avoided as surveillance can be very limited and they can attract all kinds of crime and anti-social behaviour, but if they cannot be designed out they should be gated and over looked from habitable rooms.
8. Street lighting should conform to BS5489-1:2020. Larger car parking areas should be lit to BS12464-2:2007.

9. Perimeter, boundary and divisional treatments including gates. 1.8m divisional and boundary close board fencing or wall should be installed to protect the side and rear garden, as detailed in SBD Homes 2019. Any support rails should face into the gardens so they cannot be used as climbing aids. Any garden paths should be gated at their start to remove any recesses or hiding areas and should serve no more than 4 dwellings.
10. In the public realm, trees should be fastigate and branches pruned so they are no lower than 2m and other planting should be no higher than 1m, to provide a 1m sight line thus improving natural and informal surveillance.
11. Frontages should be designed to be active, along with defensible space for all buildings.
12. If approved, site security is required for the construction phase. There is a duty for the principal 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.

To meet SBD physical security requirements, SBD require door sets and windows to be certified by an approved independent third-party certification body e.g. (UKAS) in the name of the final manufacturer/fabricator. This requirement exceeds the requirements of Building Reg ADQ. Products that are independently certificated to recognised security standards have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies.

EDC Officer Comment: Design comments in respect of creating safe and accessible places that minimise opportunities lie at the heart of good place-making and are principles adequately included within the masterplan, as evident from the positive Building for a Healthy Life Assessment. Whilst the detailed comments provided mostly relate to either building regulations matters or discretionary accreditations, a notable commitment in the masterplan is the maximisation of active frontages. Kent Police CPDA would be re-consulted on future detailed designs when submitted.

Kent Fire & Rescue - Confirm that the off-site access requirements of the Fire & Rescue Service have been met.

EDC Officer Comment: Whilst it is noted that KFRS raise no concerns at this stage, it is relevant to note that detailed access and tracking drawings would require consideration at the applicable reserved matters stage of the development.

6.0 PLANNING POLICY

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The development plan comprises the adopted Gravesham Local Plan Core Strategy September 2014, saved policies from the adopted Gravesham Local Plan First Review 1994 and the Kent Minerals and Waste Local Plan 2020.
- 6.3 Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework (NPPF, paragraph 215).

6.4 The policies relevant to the consideration of this application are set out below:

Gravesham Local Plan Core Strategy (LPCS) - September 2014

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS03 – Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- Policy CS07 – Economy, Employment and Skills
- Policy CS08 – Retail, Leisure and the Hierarchy of Centres
- Policy CS10 – Physical and Social Infrastructure
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS13 – Green Space, Sport and Recreation
- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density
- Policy CS16 – Affordable Housing
- Policy CS18 – Climate Change
- Policy CS19 – Development and Design Principles
- Policy CS20 – Heritage and the Historic Environment

Gravesham Local Plan First Review 1994

- Policy LT6 – Additional Open Space in New Housing Development
- Policy T1 – Impact of Development on the Highway Network
- Policy T9 – Housing Estate Layout
- Policy P3 – Vehicle Parking Standards

Kent Minerals and Waste Local Plan – September 2020

- Policy CSM6 – Safeguarded Wharves and Rail Depots
- Policy DM8 – Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities

6.5 The following national and other planning guidance is also relevant and material to the determination of this application:

National Policy & Guidance

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide
- Building for a Healthy Life 2020

GBC Supplementary Planning Guidance

Gravesham Borough Council has adopted a number of Supplementary Planning Guidance documents. The following documents are relevant to the consideration of this application:

- Residential Layout Guidelines (July 1996)
- SPG 1: Landscape Character (July 2006)
- SPG 2: Biodiversity Conservation (July 2006)
- SPG 3: Archaeology in Historic Towns (July 2006)
- SPG 4: Kent Vehicle Parking Standards (July 2006)
- The Kent Design Guide

EDC Design Guidance

- Ebbsfleet Implementation Framework
- Design for Ebbsfleet Guide
- Ebbsfleet Public Realm Strategy
- Ebbsfleet Sustainable Travel Strategy

7.0 PLANNING APPRAISAL

- 7.1 This submission seeks approval of a masterplan for the outline approved residential land pursuant to condition 8 of the outline permission. The principle of developing a masterplan for the residential part of the site (i.e. excluding the employment and food/drink land) has been agreed between parties and is allowed for by the condition.
- 7.2 The reason for the imposition of condition 8 was to provide a detailed framework to co-ordinate future individual reserved matters applications based on an agreed masterplan that establishes principles to guide a sustainable development that is of a high quality and responds to the character of the site. Accordingly, the required output from this process is to establish a set of design principles to be used to inform and co-ordinate future detailed reserved matters submissions.
- 7.3 In addition to demonstrating compliance with adopted Gravesham Local Plan Core Strategy (LPCS) policies, it is also necessary for the masterplan to embed principles contained within EDC design guidance including Design for Ebbsfleet, Ebbsfleet Sustainable Travel Strategy and Ebbsfleet Public Realm Strategy. This guidance formed the basis of positive pre-application and post-submission discussions with the applicant. The masterplan was also subject to independent review by the Ebbsfleet Design Forum prior to submission in May 2020.
- 7.4 The proposed residential masterplan identifies the following vision for the development which broadly aligns with the vision for the site as set out in the Ebbsfleet Implementation Framework:
- A sustainable new neighbourhood within Ebbsfleet Garden City.
 - A scheme that reflects and celebrates the site's rich industrial heritage.
 - A cohesive network of streets and open spaces.
 - A range of new homes connecting to the River.
 - A waterfront leisure destination within the Garden City.
- 7.5 The submission establishes a clear boundary for the residential masterplan which comprises the land owned by Bellway Homes and accordingly land over which the applicant has control of and can deliver on. Some parts of the site are subject to covenants that restrict what it can be used for and/or comprise commitments on third party land owners to carry out work to enable delivery of the residential scheme.
- 7.6 The outline planning permission was accompanied by an indicative masterplan, but for the avoidance of doubt that plan has no status in considering this application as it was submitted for illustrative purposes only. The proposed masterplan is based on the details fixed through the outline approved parameter plans that dealt with land use, access, open spaces and building heights. However, during the design evolution of the masterplan the applicant identified three specific aspects of the scheme where their preferred approach was inconsistent with the current outline planning consent. These relate to the following:

- (i) building heights to the south side of the proposed Fastrack corridor increased from 3 to 4 storeys;
 - (ii) re-interpretation rather than retention of the College Road flint wall; and
 - (iii) relocation of the community building from Hive Lane to the riverfront.
- 7.7 Whilst the acceptability of these 3no. changes will be considered as part of a holistic assessment of the proposed masterplan, it is relevant to note that each are subject of separate standalone submissions that seek to vary the terms of the outline planning permission through the s.96A “non-material amendment” process. Accordingly they will each require separate approvals and it is important to note that the residential masterplan cannot be approved at this stage if any of these s.96A applications are refused, since it would result in the masterplan being inconsistent with the outline permission. This is acknowledged between parties within a Planning Performance Agreement entered into prior to formal submission.
- 7.8 Condition 8 includes a list of matters (a to z) that require consideration and incorporation within the masterplan. These matters are grouped into broad headings and discussed in the following assessment of the proposed residential masterplan.
- 7.9 Land Uses
- (a) Land use disposition including floor space areas**
 - (b) Broad mix and type of housing, including approximate density and indicative distribution of affordable housing**
 - (d) Location of neighbourhood centre, including the community centre**
- 7.10 The masterplan covers the land approved for residential use so is principally residential in nature, but does include provision for a community centre as required by the outline permission, as well as public open spaces.
- 7.11 Whilst the outline permission allowed for inclusion of some retail floorspace adjacent to the existing local centre at The Hive, it did not require it and Bellway have decided not to include any retail floorspace in this location.
- 7.12 Other uses approved by the outline planning permission but which lie outside the boundary of the proposed residential masterplan include employment floorspace (up to 46,000sqm of B1/B2/B8 uses) and food and beverage floorspace (up to 500 sqm of pub or food and drink uses (A3/A4)). These uses would be included as part of a separate masterplan should proposals come forward for the remaining part of the site.
- 7.13 In respect of mix and type of housing, LPCS Policy CS14 seeks to ensure that there is an appropriate range and mix of housing across the Borough to create balanced communities. The masterplan identifies an approximate 50:50 split between houses and apartments, comprising a mix of 1 and 2 bedroom apartments and 2, 3 and 4 bedroom houses and confirms that all would be designed to meet the Nationally Described Space Standards (NDSS). As per the s.106 Agreement, at least 25% of the private dwellings and 50% of the affordable dwellings would comply with building regulations accessibility level M4(2).
- 7.14 In terms of affordable housing, the masterplan confirms the developer’s approach is to deliver the full policy compliant 30% provision on site, rather than seek to defer some via a commuted sum which is an option allowed for by the s.106 Agreement.

This is a welcome approach and would equate to 160no. tenure blind affordable houses (c.40%) and apartments (c.60%) with a tenure mix comprising 60% intermediate housing and 40% affordable rented housing. The affordable housing stock would include 6no. 'wheelchair ready' dwellings (M4(3) (2)(b)). The Borough Council would have nominations rights for these dwellings, to ensure the priority is on meeting local needs.

- 7.15 In respect of the distribution of affordable housing across the site, the developer has advised that this has been informed by discussion with Registered Providers who prefer freehold ownership of blocks (as it allows flexibility on a plot of land they can manage) and that single tenure apartment blocks are preferable to simplify service charging and to ensure that the management and maintenance is achieved at their highest standards. This is acknowledged and, having regard to the location of existing affordable dwellings adjacent to the site, the proposed indicative distribution is considered acceptable.
- 7.16 The Council's Strategic Housing Market Assessment (SHMA) indicates that there is a need for 2 and 3 bedroom market properties and 1 and 2 bedroom affordable properties, reinforcing that the masterplan includes an appropriate mix and type of housing that reflects identified local need as agreed by the Borough Council.
- 7.17 There is a separate live application by Bellway (EDC/20/0077) that seeks approval to relocate the proposed community centre from the land east of The Hive local centre to the western end of the riverside promenade. The masterplan is premised on this change being approved and shows the ground floor of the westernmost riverside apartment block comprising community use. Bellway consider that relocating the community facility would have the benefit of assisting in the creation of an active frontage along the riverside that aligns with EDC's wider aspirations to create activity along the riverfront. Whilst acknowledging there are some local concerns, having regard to physical distances and improved connections that would be provided as part of the development, the proposed modest increase in size being offered, as well as the benefit it would have by reinforcing and supporting activity and vibrancy of the Northfleet River Park, the proposed relocation is considered to be acceptable in principle. In considering the community benefits of the development more widely, it is relevant to have regard to other factors that would reinforce community cohesion such as the provision of new public open spaces and improved connectivity and access within the area.

7.18 Environmental Considerations

(c) Response to environmental constraints, including noise

- 7.19 The environmental impacts of the proposed development, and its relationship to impacts from adjacent established and proposed industrial uses, were assessed at the outline stage through an Environmental Impact Assessment. The main considerations were ensuring that acceptable living conditions can be provided for future residents (GBC LPCS Policy CS19) and that introducing new dwellings into this area would not adversely affect, nor force unreasonable restrictions on, the adjacent industrial uses or safeguarded minerals infrastructure (KCC MWLP Policy DM8). It concluded that the existing (and future) noise climate should not preclude a reasonable design solution being provided at the detailed design stage, albeit likely requiring some dwellings closest to the noise sources to incorporate mechanical ventilation.

- 7.20 Detailed noise mitigation would be established at future reserved matters stage with detailed designs, such as the precise layout, form and construction of individual buildings, informed by updated noise surveys (as required by the outline permission). However, it was considered necessary for these environmental constraints to be considered, as far as practicable, at masterplan stage. The proposed masterplan (and supporting information) demonstrates an understanding and acknowledgement of the environmental constraints and identifies how they have been considered in developing the components of the masterplan such as building layout, form and orientation. Notably the proposed perimeter block arrangement would protect private garden areas. It also identifies possible mitigation options such as mechanical ventilation and avoiding open balconies where necessary.
- 7.21 However, whilst KCC Minerals and the Port of London Authority are satisfied at this stage in respect of protecting the safeguarded minerals infrastructure (namely Robins Wharf and 42 Wharf), an initial objection was received from Tarmac who own and operate land at 42 Wharf to the east. Tarmac were concerned that the masterplan provides insufficient consideration of the site's noise constraints but have since removed their objection following a commitment by the applicant to undertake further noise assessment.
- 7.22 The concern stemmed from the proposal that would allow full delivery of the residential development in advance of the employment development and therefore that the ability of the future employment buildings to provide a physical noise barrier cannot be guaranteed. In seeking to protect their commercial operations, reference is made to planning restrictions imposed on their existing and approved import terminals in respect of noise levels when measured at adjacent existing and proposed residential dwellings. Following a meeting between parties (Tarmac, Bellway and EDC) it was evident that Tarmac's main concern relates to noise levels in proposed private garden areas where noise is more difficult to mitigate.
- 7.23 Whilst the outline approved employment buildings would provide a physical barrier and may be delivered alongside the residential land, it is accepted that this cannot be guaranteed so the residential scheme cannot rely on this for mitigation.
- 7.24 Notwithstanding that the future detailed design must be informed by a noise assessment to be approved before any development could commence on site, to seek to provide reassurance on this issue the applicant prepared a desk based noise assessment. This assessment tested the masterplan against the forecast noise levels from the as yet unbuilt Tarmac bulk aggregate import terminal, which would represent the "worst case" noise source. It focussed on external (rather than internal) noise levels which are harder to mitigate and concluded that private garden areas are not likely to exceed the recognised WHO limit of 55dB, a threshold confirmed by GBC's Environmental Health Officer as being appropriate. Although limited in its scope, this additional noise assessment supports the acoustic noise report and the assessment made at outline stage and provides further reassurance at this stage that noise is capable of being adequately mitigated, even in the absence of a noise barrier provided by the employment buildings.
- 7.25 Whilst not a planning matter, it has been explained further by the applicant that the parcel of land to the north-east corner of the residential masterplan is subject to a covenant preventing residential use whilst the Tarmac aggregates facility is in operation. This does therefore present an opportunity for this land (currently proposed as ancillary open space) to be utilised as a noise/dust buffer if deemed necessary at the detailed design stage.

- 7.26 No response was received from the operator of the safeguarded wharf to the western end of the site (Robin's Wharf), but it is relevant to note that this relationship was fully tested at the outline stage in liaison with the operator, Aggregate Industries. The detailed design would also need to build in protection from noise sources generated from the small complex of industrial buildings on the corner of College Road and The Shore.
- 7.27 It is therefore considered that environmental constraints have been considered as far as reasonably practicable at this masterplan stage, noting that full mitigation measures require approval before any development could commence and further consultation would be undertaken with relevant consultees and landowners.
- 7.28 Form and Character of Development
- (g) Form of development and design**
 - (h) Unifying elements of design**
 - (i) Integration (through design) between the residential and employment land**
 - (j) Building heights consistent with the outline parameters**
 - (k) Architectural style and treatment of the buildings**
 - (l) Building materials palette including incorporation of flood resilient and resistant materials where appropriate**
 - (m) Location of landmark buildings and creation of vistas through the site to and from the River Thames**
 - (w) Treatment of frontages**
- 7.29 In broad terms, the masterplan comprises taller apartment blocks to the northern part of the site and lower level houses to the southern part, albeit with some apartment blocks fronting onto Hive Lane within the southern part.
- 7.30 A landmark building up to 8 storeys in height is proposed adjacent to Robins Creek and, subject to final design, would be a positive element of the scheme. Although residential in use it is proposed to comprise ground floor community use and the opportunity to present an active frontage to the surrounding public realm is a key reason to support the proposed relocation of the community building to this location (s.96A application reference EDC/20/0077). The community facility (potentially with some ancillary uses) in combination with some ground floor residential accommodation in the riverfront blocks would help maximise ground floor animation and activity along the riverside promenade and help reinforce it as a welcoming and usable space rather than just a space to pass through.
- 7.31 The masterplan aligns with the outline parameter plans in respect of building heights, except an increase from 3 to 4 storeys to the south side of the Fastrack corridor. This change is accepted in principle as it is appropriate to the scale, massing and hierarchy of the site to maximise views, enclosure and integration between built form either side of the Fastrack corridor. A s.96A non-material amendment application (reference EDC/20/0078) has been submitted concurrently as it provides the mechanism to amend the building heights parameter plan to ensure consistency with the proposed masterplan.

- 7.32 A key vista is proposed along Hive Lane to provide a physical and visual connection between Northfleet and the River Thames, and expansive river views and interaction would be provided through the location and topography of the various public open spaces.
- 7.33 The masterplan has developed a good range of design narratives from surrounding architectures and urban character within Gravesend. The character areas have been developed to ensure coherence across the site and generally the masterplan provides sufficient design direction to indicate a distinctive and characterful scheme, subject to further architectural design development that interprets these principles within the form, façade articulation, materials and detailing at the reserved matters stage.
- 7.34 Initially concerns were raised in respect of the College Road character area that failed to capture the distinct character of that road defined by the flint boundary wall. The principle of re-interpreting the flint wall through the form, appearance and materiality of the new buildings is supported, particularly since a structural survey has identified that the existing wall isn't stable enough to be retained as part of the redevelopment. Appropriate re-interpretation through the buildings (as opposed to retention and/or rebuilding) would also present opportunities to create a more active and safe environment along College Road, which is proposed to become a shared space. It has been agreed between parties, including KCC Heritage, that details in the masterplan be stripped back at this stage to allow for detailed consideration at the applicable reserved matters stage, but with some key principles such as a consistent roofline provided. In respect of the changes proposed to condition 40 of the outline consent to facilitate this re-considered approach to the flint wall, it is considered necessary that a photographic record and approval of the replacement scheme both need to be agreed prior to any demolition, which has been agreed with the applicant pursuant to s.96A application reference EDC/20/0075.
- 7.35 The majority of comments received from the Kent Police Crime Prevention Design Advisor concern detailed matters and building regulations. However, a key 'masterplan' level comment is around securing active frontages and defensible space for all buildings. This interaction and interface between buildings and streets is an important feature of the masterplan. In addition to ensuring entrances are provided to animate the street scene, a hierarchy to street frontages and enclosures is established, notably comprising defensible spaces set behind railings for the principal streets such as Fastrack and Hive Lane. A key principle is that hedge planting is to be provided on the public side of the railings (rather than within private front gardens), to ensure they are well managed and maintained.
- 7.36 Aside from the modestly sized community facility, the outline consent does not allow for any other non-residential uses along the section of riverside promenade that would be delivered by Bellway. However, revised site levels along the riverfront necessary to future proof flood risk would present opportunities for increased activity onto the promenade, supplementing the proposed stepped landscape to prevent inactive frontage to the riverfront buildings. The masterplan also demonstrates how entrance cores to the riverside apartment blocks can be exaggerated in scale and form to maximise ground floor interest which is positive.
- 7.37 In terms of design integration between the residential and employment land, due to the physically separate location and typology of these buildings, and as details of the employment buildings are not presented at this stage, the masterplan does not address this relationship. However, a consideration of the future masterplan(s) for

remaining land would be to ensure some degree of physical integration between the residential and employment areas, most appropriately to be dealt with through scale, massing and appearance of the buildings to be sited in the central 'transition' part of the wider site.

7.38 Open Space, Landscaping and Biodiversity

(e) Indicative locations of all areas of public open space, comprising not less than 3.5 hectares to include, but not limited to, a riverside promenade, a junior playing pitch, a mixed use games area, a heritage park and a combined locally equipped area of play and neighbourhood equipped area of play

- 7.39 The residential masterplan includes the majority of the public open spaces identified in the outline approved green spaces parameter plan. This includes a section of the riverside promenade, the school playing pitch, the heritage park (referred to as Bevan's Park) and a play park (referred to as Chimney View Park). The proposed open spaces that are not included are the eastern section of the riverside promenade and the war memorial garden to the far east adjacent to Tarmac's industrial operations, to be included within a future employment masterplan.
- 7.40 The masterplan includes a good level of green infrastructure and open space ensuring existing and proposed dwellings are within a short walk of a range of outdoor spaces. The green spaces form a contiguous green link and the enhanced levels of tree planting and general planting within most streets creates a reasonable level of green connectivity between informal landscape, gardens and larger scaled green areas. The provision of three parks, each with their own distinctive character, is a notable strength of the masterplan. Each of the parks has been carefully considered to take advantage of the topography, views, ecology and climactic conditions, and has considered the landscape character and heritage of the area to create characterful and distinctive public spaces that have the potential to become intrinsic to the identity of the wider community within Northfleet. Accordingly the masterplan provides a strong and clear framework to guide the detailed park designs in due course.
- 7.41 The play strategy includes a combined NEAP & LEAP within Chimney View Park, together with an area of lawn within Bevan's Park, numerous doorstep play provisions, a fitness trail and an outdoor gym. The original outline requirement for a MUGA on the Lawn Road headland area as part of the heritage park has been re-interpreted and the masterplan commits to alternative provision to support the needs of older children. This includes trim trail equipment and a flexible green area of open space with goal posts for informal sport and play in the heritage park, and an outdoor gym along the riverfront, in addition to neighbourhood play equipment such as goalposts to be included in Chimney View Park. The proposed doorstep play locations to the west of the site have also been adjusted and are now located within larger areas of incidental open space which is welcomed.
- 7.42 Whilst the role of Chimney View Park would be as a destination play area and community hub, and the inclusion of an area for food growing, a surface SUDs feature and fruit trees are welcome aspects to diversify its function and appeal. The masterplan has been revised to allow for the potential for better integration between Chimney View Park and the adjacent urban fabric, principally to avoid frustrating improved connections should adjacent land be developed in the future and to recognise the opportunity provided by adjacent land owned by Bellway that falls outside the scope of the outline permission. The setting of this proposed park has been improved by removal of initially proposed dominant parking now replaced with

fewer parallel bays that would be well screened by planting to conceal and minimise the impact of parked cars.

- 7.43 The masterplan includes a riverside promenade that would form part of the wider strategic Northfleet Riverside Park to extend between Robins Creek (west) and Cable Wharf (east). The river wall structure has the effect of requiring a large “no-build” zone along the waterfront which allows for a wider riverside park than specified by the outline planning permission, and would be up to 26 metres in parts. This is proposed as an active space as well as being a pedestrian and cycle route, with formal provision such as outdoor fitness equipment in addition to less formal features such as doorstep play, seating areas and lawns, with a landscape-led design and maximisation of vantage points for river views. The revised site levels in response to flood risk would present opportunities at the detailed design stage for the fronting buildings to have active ground floor uses to supplement activity to be provided by the relocated community facility which was an important point raised by the Ebbsfleet Design Forum. A negative aspect is the proposed use of part of this space for car parking to serve the apartments, although the extent of land potentially required has been reduced by redistribution of parking and the need for it would be reviewed at the detailed design stage. If required, a pre-requisite established in the masterplan is that spaces would be leased to allow re-purposing should demand for parking reduce over time as expected.
- 7.44 To the western end of the site, adjacent to Robins Creek, a surface SUDs feature is proposed for functional drainage reasons but is proposed to incorporate a boardwalk to create a multi-functional and accessible public space.
- 7.45 Following concerns in respect of ability of the applicant to deliver the complete heritage park due to land ownership constraints, reassurance has been provided that there is a covenant that requires the current landowner of the lower section of land to demolish the existing gatehouse structure and to allow access to deliver the full park. This is particularly important as the lower section of land completes the park and allows for connectivity to the remaining residential area.

(f) Biodiversity measures consistent with the Outline Ecological Mitigation and Enhancement Strategy

- 7.46 The masterplan incorporates commitments already secured through the approved site-wide Outline Ecological Mitigation and Enhancement Strategy in respect of a commitment to incorporating green/brown roofs and identifying areas where lighting should be limited to protect river and cliff ecology. It also commits to incorporating bird and bat boxes into the detailed design of buildings in specified locations.
- 7.47 Whilst the southern and western site boundaries comprise an abundance of self-seeded Sycamore trees, a tree report indicates that they have low arboricultural value. There are no protected or veteran trees within the site and the main value of existing boundary trees is their visual presence. Whilst the potential to retain the tree group to the south of Chimney View Park along boundary with The Hive would be explored at detailed design stage, the extensive land regrading works would require most trees to be removed. Any existing cliff habitat affected by development would be reinstated.
- 7.48 However, a strength of the masterplan is the landscape-led design approach that would present opportunities for creation of new habitats to mitigate as well as enhance the ecological value of the site.

7.49 Access, Connectivity and Vehicle Parking

(n) Cross sections and perspectives of key streets, buildings and open spaces

(p) Principal routes (vehicular, public transport, pedestrian and cycle) and connections to surrounding area, including public footpaths

(q) Dimensions and alignment of Fastrack bus corridor

- 7.50 The masterplan proposes a grid network of new streets on a north-south and east-west axis, which integrates positively with the surrounding area. The gridded urban form would create strong visual and physical connections through the site, including to the River Thames.
- 7.51 The proposed street network supports strong pedestrian connectivity through the site and across the wider area, efficiently linking the proposed new facilities, parks and open spaces within the Northfleet West site with key local destinations such as Lawn Primary School and Northfleet High Street. The site's complex topography is challenging, however the inclusion of a new pedestrian/cycle bridge ensures good east-west connectivity through the heritage park and to the local primary school. The masterplan works hard to ensure the majority of the pedestrian routes are well overlooked, attractive and direct to encourage walking.
- 7.52 The masterplan has been updated to align with the Ebbsfleet Public Realm Strategy (PRS) in respect of the street specifications, notably in respect of footways, segregated cycle lanes and landscaped verges, to establish a clear hierarchy and promote green landscaped streets that prioritise walking and cycling. These are presented in the form of typical street sections. The street network develops these baseline designs within a three tier hierarchy; Hive Lane and the Fastrack boulevard being developed as tree lined boulevards (primary streets), with secondary streets feeding from these, and tertiary streets designed as laneways/mews within development blocks and on the edges of the site.

Fastrack Corridor

- 7.53 The masterplan confirms that the section of Fastrack corridor through the residential area would comprise on road running, as opposed to comprising a carriageway and a dedicated bus lane. Whilst the benefits of segregated provision is acknowledged and is encouraged in the Ebbsfleet Implementation Framework and promoted by KCC Highways, it has been accepted on this site that on road running consistent with development at Northfleet East is acceptable due to the barrier effect a wider road would have and due to physical land constraints in particular locations.
- 7.54 The east-west Fastrack corridor is the widest and most prominent street within the proposed masterplan and as such is identified as a Level 1 type street as defined in the Ebbsfleet Implementation Framework. Following discussions, an acceptable position was agreed based on the PRS, most notably committing to a segregated 2-way cycle path and footways that exceed the usual width required by the local highway authority. Also worthy of note is that the street trees strategy aligns wholly with the PRS.
- 7.55 KCC Highways raised concerns in respect of using the Fastrack road for refuse and service vehicles, advising that unnecessarily delaying of buses would undermine the concept as delaying journey times would affect patronage. The masterplan was amended to include a commitment to incorporating service bays at the detailed

design stage, sufficient to overcome this objection. The location of bus stops/shelters would be established at the detailed design stage.

- 7.56 In terms of the vertical alignment of the Fastrack corridor, it has been explained by Bellway that the ground floor entrances to the majority of the riverside units would be at grade, however as the road drops in level towards the College Road junction to the west the feature corner building would be elevated. At this location the channel level of the road would be approximately 1.1m below the finished floor level of the riverside apartment block. In addition the far eastern apartment block to the south of the Fastrack corridor adjacent to the plaza would also be set slightly higher than the road, as the route also drops to a level of 6.6m AOD adjacent to the plaza. The approximate level of the road at the centre of the apartment building would be 7.4m AOD and the block finished floor level would be 8.0m so the variance would be minimal.
- 7.57 Whilst the final Fastrack design would require some localised variation, such as to allow modest verge widening to accommodate bus shelters and incorporate service bays, the commitments provided in the masterplan are sufficient to ensure an acceptable design for this Level 1 street.

Hive Lane

- 7.58 This is a principal north-south route connecting Northfleet High Street to the riverside, so is an important movement corridor for existing and future residents. The straight road is designed to provide a strong vista towards the River Thames and in functional terms would serve cars, service vehicles, emergency vehicles as well as pedestrians and cyclists. The dimensions align with the PRS and, again, a notable revision has been the incorporation of a segregated 2-way cycle lane in addition to a widened verge to accommodate on street parking bays.
- 7.59 The northernmost section of Hive Lane, north of the Fastrack corridor, has been downgraded to comprise a shared space rather than a road, which is a welcome change to the address of the public realm on this connection to the riverside promenade. The street separating the Bevan's Park Edge and Hive Lane character areas in the southernmost development parcel would benefit from some additional street trees to break up the rear facades of the four storey apartments on Hive Lane, which is a detail that can be discussed at reserved matters stage.

College Road

- 7.60 It is proposed that the section of College Road fronting to the western site boundary is treated as shared space, providing vehicular access only to the dwellings fronting onto it. KCC Highways welcome this mews style street approach with increased permeability to the site with cycling and walking routes and agree that the detailed design can be finalised at the applicable reserved matters stage.
- 7.61 In response to comments from ward councillors regarding construction access arrangements, the developer requires approval of a construction management plan prior to any works commencing and this would establish agreed routes for construction vehicles. It is anticipated that the majority of construction access, if not all, would be via the existing tunnels through the employment land that provide a direct connection onto Thames Way and therefore avoiding local roads. This document would also build in measures to protect general amenity of residents in the area and ensure good practice to minimise disruption during the construction phase.

Green Routes (pedestrians and/or cyclists)

- 7.62 A principal 'green route' within the masterplan is the pedestrian/cycle bridge connection between Hive Lane and the heritage park. In addition to providing access to the park and school playing pitch, this will also form an important route to the local primary school. Whilst the developer has explained that relative site levels do not allow for creation of a safe route directly to Lawn Road, the masterplan does incorporate a step free route albeit requiring an elongated path around the perimeter of the sports pitch. To reinforce the safety of this route, the masterplan identifies an informal pedestrian crossing point (potentially a zebra crossing) across Hive Lane as well as ensuring the route is well lit.
- 7.63 There are a number of public rights of way which cross the site, one of which (NU42) has been partly closed for the past decade following land regrading to facilitate construction of the private railway tracks serving the industrial land. Condition 48 of the outline consent allows for alternative and/or diverted routes to be agreed in principle through the masterplan since these will be key principles to establish at this initial stage. Accordingly the developer and EDC have been in discussion with KCC PROW to resolve the most appropriate approach to incorporating the public footpath network into the masterplan and a positive outcome was achieved.
- 7.64 The masterplan illustrates the agreed approach which includes diverting the north-south footpath (NU3) along the eastern edge of the development that would comprise a more attractive route than along Hive Lane. The short section of east-west footpath (NU6) would be diverted along the riverside promenade. The masterplan commits to providing public access along the route of footpath NU42 to connect Lawn Road to the riverfront via heritage park and interconnection with footpath NU3. The original definitive alignment of NU42 cannot be provided due to land levels and presence of railway tracks that cut off the route, but KCC are content that the scheme would provide for re-opening this pedestrian connection. The residential scheme has no direct implications on footpaths NU7 and NU7A as these are located adjacent to the employment land, and so would be covered if and when a masterplan for that land comes forward.

(r) Access and car parking, including emergency access from Church Path Pit

- 7.65 Access would be provided by the clear grid hierarchy of streets and connections discussed above, including good arrangements for segregating pedestrians and cyclists along key routes in accordance with the PRS. Emergency access from Church Path Pit would be required for the employment development so can be excluded from this submission as it has no influence or impact on the residential masterplan.
- 7.66 In respect of car parking, the expectation is that it aligns with the Ebbsfleet Sustainable Travel Strategy (STS). The STS requires regard to be had to sustainable travel opportunities and measures to inform the level of car parking to be provided, with the ultimate objective of supporting modal shift. The application site lies within a 'highly accessible area' as defined in the STS, due to its proximity to a planned Fastrack bus route as well as the availability of regular bus services along Northfleet High Street and its proximity to Northfleet Station and Ebbsfleet Station. However, it is necessary to have regard to site-specific factors when considering this.
- 7.67 The outline consent requires approval of a residential travel plan prior to occupation of any dwellings, but it is important to establish a requirement for any 'hard' measures that need to be incorporated into the design of the scheme in advance. The

masterplan commits to the provision of 3no. car club spaces within the development, and the supporting technical note anticipates that a car club would be implemented in the early phases as recommended by KCC Highways.

- 7.68 The masterplan also commits to a good level of cycle parking for both residents and visitors as a further means of reducing car use, in accordance with the STS. In addition to on plot storage for houses and apartments based on one space per bedroom, cycle parking is incorporated into all three of the parks. The scheme does not include provision for a bicycle share facility, as the developer does not consider it necessary to incorporate one, suggesting that the employment land may comprise a better location for such a facility as the residential scheme would provide more than sufficient storage for any resident who owns a bicycle.
- 7.69 The developer acknowledges that the separate travel plan should incorporate incentives for residents to travel by modes other than the private car, which officers have advised should consider measures such as subsidised bus travel, cycle vouchers and/or cycling proficiency training costs. A draft Travel Plan and Travel Information Pack has been submitted for information only.
- 7.70 Having regard to the highly sustainable location, and the above measures, the masterplan proposes the following parking provision:
- 1 bedroom apartment – 1 space
 - 2 bedroom house/apartment – 1 space
 - 3 bedroom house – 1.5 spaces
 - 4 bedroom house – 2 spaces
- 7.71 The masterplan is predicated on a mix of dwellings comprising 95no. one bedroom units, 250no. two bedroom units, 152no. three bedroom units and 35no. four bedroom units. This is an indicative mix only as the scheme remains subject to detailed design and assessment at reserved matters stage, but this is helpful to appreciate how the proposed parking numbers compare with those promoted through the STS.
- 7.72 On this basis the masterplan identifies a total provision of 682no. car parking spaces, compared to the maximum level derived from the STS which would be 523no. This provision exceeds the maximum level set out in the STS, most notably a result of visitor parking being proposed in addition to the above (as opposed to being a component of it).
- 7.73 However, it is necessary to consider site-specific issues and in this case, as the site lies directly adjacent to an existing residential area, the developer has raised concerns that reduced parking in the development would result in parking overspill to the surrounding streets. This concern has been raised by the local ward councillors. The developer does though accept that a bespoke parking standard is appropriate for this site to balance parking requirements and market demand whilst also promoting sustainable travel options.
- 7.74 The masterplan commits to a variety of parking typologies including podium parking along the waterfront area, on street parking, parking courts, front curtilage parking and on plot driveways and garages. This is welcome and by maximising the provision of street parking, that would be available for visitors and/or resident permits, it presents future opportunity for re-purposing of the spaces should car ownership reduce as expected. In respect of parking management, the developer

advises they have been in discussions with the Borough Council's Parking Services Manager, and acknowledge that Traffic Regulation Orders will be required to put in place on street parking restrictions.

- 7.75 Accordingly, due to the appropriate mix and form of parking provision proposed, the fact that the quantum exceeds the level established in the STS should not necessarily result in actual harm to the development. For example, tandem parking in a side driveway of a house would have no more visual harm than a single space. In terms of the visual presence of car parking, a notable improvement has been demonstrated at masterplan level that car parking around Chimney View Park can be provided within on street parking bays to remove the dominant front curtilage parking originally proposed.
- 7.76 However, an area where the provision of car parking does raise concerns is along the riverfront as the masterplan is showing potential for surface car parking to the north of the riverfront apartments blocks. This concern is over potentially compromising the riverside promenade open space and was a concern initially raised by the Design Forum. This has been discussed at length, with suggestions to relocate it to the Fastrack corridor and/or temporary car park east of the riverfront blocks being considered but discounted by the applicant. The revised masterplan confirms that any parking in this location would be unallocated (i.e. available to residents by lease only) and also reduces the extent of land to be used (if necessary) but comes with commitment from the developer to review the need for this parking at the reserved matters stage. Although it is considered that this parking would not be necessary if the apartment podium parking was unallocated (to allow a reduced parking ratio) the above commitments are considered sufficient to be able to compromise on this matter at this masterplan stage.
- 7.77 KCC queried parking arrangements for the sports pitch. This is a school facility to be made available for community use on a managed basis outside of school hours, such that users could either utilise on-site school parking, street parking or be expected to walk or cycle utilising the proposed new pedestrian bridge connection. No specific parking area is proposed.
- 7.78 In respect of electric vehicle (EV) charging, following positive negotiation the masterplan was amended to commit to provision of 1no. 7kW active charge point for each house with on plot parking (i.e. a garage or driveway). For shared parking courts and podium parking areas, EV charging would be provided at 10% active and 90% passive (i.e. wiring and cable conduit in place under the car park for future use). This is a welcome approach and accords with the STS.
- 7.79 The STS recommends that masterplans should provide space for rapid charging at key locations where the infrastructure can be efficiently located and sensitivity incorporated into the urban structure. It is noted that KCC do not currently allow EV charging points to be provided within the public highway. The inclusion of an EV charging hub/car park on the land east of the riverside apartment blocks has been promoted by EDC and KCC as a means of relocating the potential riverfront parking whilst also making provision for off-street EV charging provision. However, it was questioned by the applicant as to whether a transport hub which would demand drivers to walk possibly long distances to their car every day would encourage a move to EV vehicles to the same extent that the distribution of charging facilities across the development would. Since the masterplan relates to a residential development with limited other uses, it is accepted that an EV hub is not essential, but is something that would be expected to be incorporated into the masterplan for the employment and mixed use land.

7.80 Public Realm

(s) Locations of public art

(t) External lighting and riparian life-saving equipment

(u) Surface materials palette and street furniture, including signage

(v) Hard and soft landscaping

- 7.81 The masterplan acknowledges that public art provides an opportunity to define unique areas of the site and unite each of the areas with common themes relating to history and enrich the overall narrative. It is also very positive that it acknowledges the role that public art can provide as a vehicle to engage with the wider community to add a depth of character. The approach to embedding heritage into the public realm and the three main parks is welcome, and potentially more sustainable and engaging than a piece of art work such as a sculpture. This also presents an opportunity for co-design with the local community, as advocated by the local ward councillors. That said, redevelopment of the wider site does present opportunities for sensitive relocation of the listed Bevans war memorial and Sphinx statue.
- 7.82 The masterplan includes a lighting strategy to establish at this stage which areas should be lit during hours of darkness to establish a balance between functional requirements and safety as well as minimising adverse impacts of light pollution on amenity, river navigation and ecology. It reinforces previous comments in respect of identifying dark corridors and areas where low level lighting should be used (such as along the eastern cliff edge and the riverside promenade). A necessity of the development is to incorporate street lighting for highway safety reasons and it is essential that street lighting and services are fully integrated with soft landscaping proposals, which is a detail to be developed at the reserved matters stage. The expectation is also for the physical appearance of the street lighting columns to be appropriate to their context since they comprise prominent elements of the street scene, albeit this is not reflected in the masterplan despite being raised by officers. In addition to some feature tree up lights, the strategy notably includes a commitment to lighting routes through the main public open spaces, the pedestrian/cycle bridge and floodlighting to the sports pitch to extend its use. The lighting strategy is supported.
- 7.83 The palette of surface materials identified are of high quality, with limited use of tarmac across the scheme, and are welcomed as they would set the parameters for hard landscaping within future reserved matters applications. The proposed furniture palette aligns with the PRS for Northfleet Riverside, with bold yellow employed as an accent colour along the riverside promenade.
- 7.84 In respect of soft landscaping, tree coverage across the masterplan is generally good, with tree lined streets across the majority of the site. Notably the street tree strategy aligns wholly with the Ebbsfleet Public Realm Strategy, with all species listed matching those set out in the guidance for the Thames Estuary character area. In summary, the landscape-led design approach that has been informed by detailed input from a landscape architect, is a particular strength of the masterplan.
- 7.85 Sustainable Measures – Flood Risk, Energy Reduction and Water Management

- 7.86 LPCS Policy CS18 deals with 'climate change' and sets out expectations in respect of flood risk, water quality, sustainable drainage, water demand management and carbon reduction, set against the overarching principle of supporting sustainable development.

(o) Building and renewable energy technologies

- 7.87 In seeking to reduce the overall carbon footprint of Gravesham, Policy CS18 requires development of key sites, such as Northfleet Embankment West, to consider the potential and include proposals for low carbon and renewable energy regeneration. This was dealt with at the outline stage by submission of a Sustainability Strategy (dated 2016) which concluded that the site is not well suited to large scale installations for energy supply (e.g. wind power, combined heat and power), but small scale installations will be considered in the light of extant building regulations and policy and subject to viability assessment at the detailed design stage. The outline consent includes a requirement to provide full details of such proposals at the detailed design stage, but it is considered necessary at this masterplan stage to agree some principles to guide expectations for the future reserved matters submissions.
- 7.88 The masterplan commits to the 'fabric first' principle of ensuring energy efficient building construction and materials to retain heat and optimise use of glazing for solar gain and maximising natural light. There are no policy-based targets regarding percentage reduction in carbon but the developer does refer to the intended adoption of a new set of Building Regulations late in 2020, which would push carbon emission down by between 20-31% compared to current standards, but that remains subject to review following consultation earlier this year so offers no certainty at the current time.
- 7.89 However, the masterplan does commit to the incorporation of PV panels across the development to generate on-site electricity and contribute to providing additional carbon savings, as well as green and brown roofs that help to maintain consistent internal temperatures and reduce wasted energy. A supporting technical note also includes reference to potential use of air source heat pumps for individual plots noting that heat generation is the principal source of carbon use in residential developments, albeit at this masterplan stage Bellway advise that they are not in a position to be more definitive.
- 7.90 Whilst it would be preferable to establish a 'voluntary' site-specific target for this development, with the current building regulations acting as the baseline, this is not being offered by Bellway. However, by specific reference to the potential enhanced building regulations, a clear expectation for the site is established and can be considered more fully at the detailed design stage as individual phases of development come forward.

(x) Land forming and finished levels

- 7.91 The principle of re-grading the site was agreed at the outline stage to provide a gently sloping site that addresses flood risk whilst avoiding awkward levels that would act as a constraint to efficient redevelopment. This approach would help maximise development potential for this site and ensure it is accessible by avoiding excessive steps, ramps and retaining walls that would act as a barrier to permeability. However, the existing landform and cliffs would remain exposed as a feature of the proposed heritage park.

- 7.92 The masterplan acknowledges that land raising is required along the river front to address long term flood risk, and has responded positively to comments from the Environment Agency requiring enhanced flood defence levels in light of TE2100 work over and above those required by the outline permission. The requirement is to increase the flood defence crest height to 8m AOD by approximately 2070, potentially sooner, so the masterplan has been positively amended to incorporate terracing to step up to this level along the riverfront. As mentioned earlier, in addition to ensuring long term flood protection this also presents opportunities for enhanced ground floor activation of the riverside buildings.
- 7.93 However, levels would need to step back down gradually where the riverfront buildings front onto the Fastrack corridor so this interface between buildings and the road would require an appropriate design solution at reserved matters stage. The majority of this interface would be at grade, but at the eastern and western ends the buildings would be slightly elevated above due to the need for the Fastrack road to tie into existing levels on adjacent land. This level change is not significant and should be capable of satisfactory address through detailed design.

(y) Water management and drainage

- 7.94 Due to the former industrial uses of the site, infiltration of surface water into the ground is not an option due to contamination. There are also no existing surface water sewers in the area as the former cement works discharged water direct to the River Thames. It is therefore proposed that surface water would be directed to Robin's Creek to provide an increased supply of water to it and, furthermore, that the quality of this water would be improved by first passing through a forebay that is proposed to combine as a sustainable drainage feature within a publicly accessible open space. The masterplan allocates an area of land to the south east of Robins Creek for this functional open space that would soften the transition between a hard promenade and more natural harbour, with a series of boardwalks and lookout points. The detailed surface water drainage scheme would be developed further as part of the detailed design as required by the outline permission.
- 7.95 The applicant's drainage engineer has explained that the reserved matters application for each section of the development will deal with surface water quality improvement, which due to the underlying contamination is to be via permeable paving. In addition to the Robin's Creek forebay, the intention remains to incorporate some infiltration and create a swale on the southern section of the site once the applicant can more accurately establish the nature of the soils once the earthworks commence. It is also proposed to introduce rain garden areas where they can be undertaken considering the nature of the underlying soils. This confirmation was sufficient for KCC Lead Local Flood Authority to remove an initial holding objection.
- 7.96 Foul water from the site connects to existing Southern Water sewers and the intention would be for the residential development to upgrade and connect to these sewers.
- 7.97 In respect of water demand management, Policy CS18 requires all new homes to be built to 105 litres per person per day consumption (110 litres when including 5 litres for external water use), with 5% of homes on key sites to act as exemplars by incorporating measures to reduce consumption further to 80 litres per person per day. The masterplan confirms that the development would meet the 'optional' 110 litres per person per day Part G building control level for water use that can be set by the local planning authority in the same way as requiring improved Part M accessibility levels. Whilst the intention of planning policy is to identify where

Building Regulations should be exceeded to support improved environmental performance of new developments, the practical implications of providing fittings which have flow rates so low that they become not fit for purpose are acknowledged. Regarding water re-use, the masterplan includes reference to provision of water butts in private gardens as a means for re-using water.

7.98 These high level commitments and measures are considered to be an acceptable response to the requirement of Policy CS18 and the 2016 Sustainability Statement at this stage, and would be assessed further at the detailed design stage.

7.99 Archaeology/Historic Environment

(z) Identification of areas of archaeological importance and those areas where remains are to be preserved in situ.

7.100 KCC welcome the strong commitment to the importance of the site’s rich industrial heritage, and notes that the site has pre-industrial heritage, in particular for evidence of the ice age environments of the former River Thames and these other aspects of the historic environment of the area will also need to be recorded and communicated. The approved Heritage Management Plan provides the mechanism to ensure that these needs are met as detailed design elements are developed albeit acknowledging that there is no known archaeology sufficient to adversely constrain the masterplan to the extent that it would limit the placement of built form.

7.101 The Statement of Community Involvement reinforces the evidence for the local interest in the history and archaeology of the area and the need for the development to deliver on recording information appropriately, reflecting the heritage (including new information and discoveries) in the final design and layout and disseminating new knowledge to residents and visitors.

7.102 KCC Heritage welcome the flexible approach being taken to design along College Road which will allow for agreement on detailed house and street design before the dismantling and re-purposing of flint in the College Road wall. Any proposals to relocate the Bevan’s war memorial would require separate listed building consent.

7.103 Building for a Healthy Life (BfHL)

7.104 The masterplan has been assessed against the 12 BfHL topics and is considered to perform well, achieving 11 greens, 1 amber and no reds, as follows:

01 - Natural Connections	02 - Walking, Cycling and Public Transport	03 - Facilities and Services
04 - Homes for everyone	05 - Making the most of what’s available	06 - Memorable character
07 - Creating well defined streets and spaces	08 - Easy to find your way around	09 - Healthy Streets

10 - Cycle and Car Parking	11 - Green and Blue Infrastructure	12 - Back of Pavement to front of house
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8.0 HUMAN RIGHTS

8.1 The application has been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation below, is compatible with the Act.

9.0 PUBLIC SECTOR DUTY

9.1 In determining this application, regard has been had to the Public Sector Equality Duty (PSED) as set down in section 149 of the Equality Act 2010, in particular with regard to the need to –

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. It is considered that the application proposals would not undermine objectives of the Duty.

9.2 It is considered that the application proposals would not conflict with objectives of the Duty.

10.0 CONCLUSION AND RECOMMENDATION

10.1 The masterplan written statement provides a comprehensive set of design parameters which is consistent with the outline parameters and establishes a high quality framework against which future reserved matters applications will be assessed. The overarching vision is aligned with the Ebbsfleet Implementation Framework and it has evolved well following positive discussions between parties, supported by EDC design guidance documents.

10.2 The residential masterplan performs well against the Building for a Healthy Life topics (achieving 11 greens, 1 amber and no reds) which reinforces the conclusion that the masterplan is acceptable.

10.3 It is therefore recommended for approval and that condition 8 be partially discharged accordingly.