

Appendix 1 – Councillor and Neighbour Comments

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Councillor Comments

Councillor Broadly (KCC)

- Wharves and jetties are being sterilised by housing being constructed up to the waterfront, with no opportunity for future usage.
- Northfleet is a coastal community and losing all its coastal access and assets.
- Alternative uses should be sought to retain an active maritime waterfront, with mooring, river busses, recreational crafts, etc. – Harbour Village is an example of sterilisation of a formerly active waterfront with housing.

Publication and Neighbour Consultation

2022 Responses

Support

- Local needs for affordable and new housing.
- Great use of space.
- Existing area is run down, underused and littered.
- Area shall continue to degrade without intervention.
- Regeneration of the area and revitalising the riverside area of the Thames.
- Generation of tourism.
- Good for the community and wider area.
- Safeguards the local football club – growing the fan base and allowing sustainability.
- Up to date stadium should encourage further investment in the Borough.
- Public transport links must be enhanced, as part of any agreed planning consent.
- Economic benefits – money, creates jobs, businesses, encourages spending.
- Recreational opportunities.
- Imaginative amenities and infrastructure.
- Biodiversity.
- Opportunity to deal with issues – drainage.
- Generates revenue for Gravesham Borough Council.
- Will ease traffic and congestion on match days.
- It is possible that road access to Tower Wharf will be improved.
- Need good quality parks and open spaces.

Objections

Material Planning Considerations

Housing Need

- Housing delivery does not necessitate inappropriate development as set out in footnote 7 of the NPPF (2019).

Affordable Housing

- Housing is not affordable for local people.

Change of Use / Loss of Existing Businesses

- Closure of businesses.
- The existing site is a busy, thriving industrial estate.
- Unemployment.
- Knock on effect for companies that use the product (UK and worldwide).
- Fundamental change of use including a serious reduction in industrial and commercial property which is already in short supply.
- To eject owners/occupiers is potentially a breach of human rights.
- Existing businesses often provide essential services to local people.
- Loss of specialist skills.
- Warehousing is clearly required and would need space elsewhere.
- Financial burden of being compelled to move.
- Contrary to policy.
- Disastrous for the local economy and local employment opportunities.
- Demolition of a significant number of perfectly good buildings and businesses.
- Increase shortage of industrial / commercial businesses within the area.

Impact on Protected Wharfs (Robins Wharf)

- The local plan at 4.7 refers to Robins Wharf, an area to be safeguarded. This application is in direct conflict with this.
- The ability to import significant amounts of crushed rock aggregate and marine sand and gravel via Robins Wharf, both to service the operators' on site plant/operations and to service the wider construction industry, is key to the sustainable supply of construction materials to the area.
- The wharf and associated minerals infrastructure are key in supporting the delivery of planned development in the surrounding area.
- The applicant has not demonstrated why these benefits could not be achieved without the loss of Robins Wharf and has failed to accord appropriate weight to the ongoing need to safeguard Robins Wharf.
- Not in accordance with the Kent Minerals and Waste Local Plan and NPPF (2019).

Impact on Town Centre

- Harm to Town Centre – retail space will draw customers away from the town centre.

Design, Character and Appearance

- Impact on the character of the area.
- Scale of development inappropriate.
- Deficiencies in social infrastructure – buses, schools, doctors, dentists, etc.
- Fire safety issues – large high-risk blocks.

Impact on Future Occupiers

- Potential conflict with existing businesses – the Thames is a working river.
- Noise from 24/7 operations, it is important the developers design the buildings accordingly.

Loss of Biodiversity

- Impact on wildlife habitats / Sites of Special Scientific Interest (SSSI).
- Does not achieve biodiversity net gain.

- Ecological barriers should be designed into the development to protect sensitive areas at Botany Marsh, Robin's Creek and priority habitat mudflats.

Environment

- More environmentally friendly to retain existing use – the land is likely to be heavily polluted.
- River freight is on the increase, constraining this would lead to heavy lorry traffic and pollution.

Highways Issues

- Traffic generation – including an increase in lorry traffic (river freight often reduces this).
- Increase in pollution.
- Local road system inadequate.
- Impact on traffic flow through the A226 and the B2175.

Impact on Public Right of Way

Factual Inaccuracies / Errors in submission

- The financial viability statement appears to give no consideration to properly compensating existing businesses that are being evicted.

Non-Material Planning Considerations

- No S106 payment has been proposed.
- Uncertainty could last a very long time which is unacceptable for occupiers / owners and this should be resolved within a set period (suggestion 2 years).
- Limited time available (to read the documents).
- Impacts arising from construction period
 - Noise
 - Vibration
- Local people are forced out of the area.
- Redline boundary should be moved away from existing residential dwellings.
- Lack of stakeholder engagement and consultation.
- Personal circumstances.

2023 Responses

Support

- Great use of space.
- Brilliant place for children and families.
- Opportunity to transform transport – rail, river – transport by bus is needed and parking for cars.
- Infrastructure will be improved – large scale developments often spur complementary infrastructure.
- Boosts number of homes available – it should be ensured that many are designated for local families; affordable housing is in great need; should be priced so younger people can get on the ladder.
- Existing area is run down and deprived.
- The commercial and industrial businesses are in poor condition and very unsafe.

- Safety – crime at night, cannot walk along the footpath safely.
- Large lorries speed and throw rubbish.
- The town and Ebbsfleet is in need of a focal point, Gravesend Town Centre is in decline.
- Regeneration of the area and Football Club.
- Sustainable set up for the Football Club to grow its fan base – provides stability as they look to progress.
- Risk of the Football Club being unable to sustain competitiveness without approval.
- Concept has been well thought through.
- The new stadium provision – first class sporting facilities, unrivalled regional facilities for concerts and major public events.
- The Harbourside will fit in with surrounding developments adding a further lift to the Borough.
- Relocation of existing businesses is positive as they can transfer to modern premises, reducing carbon footprint and providing a better working environment.
- Generation of tourism - increasing 'leisure pounds' spent in the Borough, the area is rich in history and should have a museum added.
- Good for the community – a football club brings people together, creates community spirit, a sense of belonging, instils local pride and identity.
- Economic benefits – creates jobs, encourages spending, increases footfall, brings prosperity, encourages new key businesses.
- Not too happy about the housing development, but a hotel is needed.
- Biodiversity and environmental impact – revived in terms of flora and fauna preservation.
- Modernisation of the area.
- Opportunity to replace lost jobs whilst repairing historical damage.
- As long as the public are not responsible for paying for works or upkeep.
- Adequate provision needs to be provided for all in terms of parking, landscaping and facilities, with the use of renewable and efficient energy and recycled materials incorporated into design.

Objections

Material Planning Considerations

Housing Need

- Housing delivery does not necessitate inappropriate development set out in footnote 7 of the NPPF (2021).

Affordable Housing

- Development makes very limited contribution in terms of affordable housing.
- Housing is not affordable for local people.

Making Effective Use of Land

- A different use of the land but would not necessarily make effective use of land, as the existing uses would need to be accommodated elsewhere (para 120 NPPF (2021) - not relevant).

Change of Use / Loss of Existing Businesses

- Businesses would not consider an alternative location and this would not be sustainable or feasible.
- Economic and social harm – uncertainty, change the mix of businesses, impact on small businesses.
- Inappropriate to be categorised as a 'brownfield site'.
- Loss of existing employment land.
- Net loss of jobs / employment (approx. 90% of jobs lost).
- Loss of skilled jobs.
- Negative impact on Gravesham's economy.
- Not only servicing local economy, but global.
- No proposals for the relocation of affected businesses.
- Northfleet has always been industrial and should remain so, developers should be directed to Gravesend.
- No evidence provided for the need for the quantum of retail, food and beverage or office floorspace.
- No evidence that the existing B uses are no longer suited, unviable or have a negative impact on the environment.
- Loss of B Class uses without providing an equivalent number of new jobs and existing premises are fit for purpose and with good levels of occupation.
- Site is not former industrial land and therefore redevelopment is contrary to Policy CS02 of the Core Strategy.
- Contrary to Policy CS07 of the Core Strategy and paras. 11(d)(ii) and 81 of the NPPF (2021), as well as aspirations of the emerging Local Plan.
- Contrary to para. 11(d)(ii) of the NPPF (2021) unacceptable loss of employment opportunities

Impact on Protected Wharfs (Robins Wharf)

- Critical to maintain the safeguarded wharves to ensure the expected increasing need for the import of aggregate can be met.
- Existing wharf capacity at Northfleet is essential.
- Loss of Robins Wharf would have significant implications in the context of mineral supply of mineral products now and in the future.
- The development would result in the loss of an existing commercial wharf.
- The proposals do not incorporate river related development and remove the existing aggregate site which utilises the existing wharfage.
- Development is fundamentally contrary to Policy CS03 of the Core Strategy, removing all the industrial and port related uses within the application site and providing a significant number of new residential homes approx. 20x greater than the policy states.
- A single comprehensive redevelopment of the site as the only option is not supported by Policy CS03 of the Core Strategy.
- Policy CS03 of the Core Strategy does not envisage the loss of Robins Wharf or regard it as forming part of the Key Site.
- Wharfs are not unviable – GBC Economy and Employment Background Paper (Oct 2020) many of the sites within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area are likely only to be suitable for employment activity in the future given their strategic assets which include wharfage and railheads.

Local and National Policy – Minerals Safeguarding

- NPPG – Minerals Safeguarding (para 002) establishes the primary importance of safeguarding mineral resource and infrastructure.
- NPPG – Minerals Safeguarding (para 006) – The long-term protection of sites is of importance regardless of whether they are currently operational.
- Contrary to stated aims of para. 11 (d) (ii) of the NPPF (2021) – unacceptable loss of a protected wharf facility used for the import of materials.
- Minerals and Waste Local Plan Policy is CSM6: Safeguarded Wharfs
 - directly names Robins Wharf as a Safeguarded Wharf and specifically identifies that both operators and their operational areas are included in the safeguarding;
 - states that planning permission will not be granted for non-minerals development that may unacceptably adversely affect the operation of existing, planned or potential sites such that their capacity or viability for mineral transportation purposes may be compromised;
 - the loss of the wharfage at Robins Creek would be contrary to adopted planning policy as it would remove its full operational capacity and would therefore be unacceptable.
- The pier and wharf at Robins Wharf are in active use, therefore it cannot be argued that their capacity is not required.
- The loss of the wharf cannot be justified as its contribution to mineral supply has not been quantified.
- The assertion that the capacity of Robins Wharf could be accommodated by other safeguarded facilities lacks evidence – no alternative site suggested.
- Cannot be demonstrated that the wharf is not viable or there is no demand as it is currently in use by two operators. The proposals do not seek to re-provide the wharf use elsewhere and therefore the proposals would not comply with Policy CS07.
- Failure to demonstrate how the need for development outweighs the need to retain the safeguarded facility – contrary to criterion 6 of Policy DM8 (Minerals and Waste Local Plan Policy) and Safeguarding SPD.
- The loss of Robins Wharf would cut across and prejudice the safeguarded aims for Kent's ongoing aggregates strategy not meeting the criterion 7 exception of Policy DM8 (Minerals and Waste Local Plan Policy) and Safeguarding SPD.
- Failure to provide a robust assessment of the existing/future capacity of Robins Wharf, its locational significance and the lack of alternative sites that could – glaring issue in application and critical in context of criteria 6 and 7 (Minerals and Waste Local Plan Policy).

Impact on Town Centre

- Retail space will draw customers away from the town centre.
- Town centre is in need of investment, should be located in a town centre location.
- All of the proposed uses fall within the definition of 'Main Town Centre Uses' within the Glossary to the NPPF (2021).
- Contrary to para. 11(d)(ii) of the NPPF (2021) adverse impact on Town Centre.

Sequential Test

- Failure to demonstrate that the proposal passes the sequential test set out within Paragraphs 87 and 88 of the NPPF (2021).

- More sequentially sustainable locations are available for the development – the extensive retail would have a significant adverse impact on the existing and planned retail centres at Dartford, Gravesend, Northfleet and Ebbsfleet Central.
- Ebbsfleet United Stadium is an established football stadium with no functional connection to retailing / no end user - therefore necessary to consider the retail element and/or 'local services' in isolation of Ebbsfleet United Stadium for the purposes of the sequential test.
- Failure to demonstrate that why the proposed retail units, ranging from c. 100m²-500m², cannot be accommodate in the existing local centres.
- Disaggregation must be applied as part of the sequential site assessment (in accordance with the Tollgate Appeal Decision).

Impact Assessment

- Failure to demonstrate that the proposal passes the impact test set out within Paragraphs 90 and 91 of the NPPF (2021).
- The proposed would undermine the ability of the town centre redevelopment to be delivered by directly competing with the Heritage Quarter vision.
- The development would result in an adverse impact and divert potential investment away from these areas centres of Gravesend, Northfleet, Swanscombe and Ebbsfleet Central East.
- Ebbsfleet Development Corporation consider the quantum of retail and leisure floorspace proposed to directly compete with the existing and planned centres.
- The provision of more out of town facilities is likely to have a significant impact on other centres.
- The assessment provided with the submission has a number of flaws and as such, the applicant should be asked to reconsider this assessment accordingly.

Office Uses

- Offices and shops are not viable – empty units in Town Centre evidence this.
- Substantial quantum of office accommodation (not in a town centre location and over of 500m walking distance of the identified railway stations) contrary to Policy CS07.

Design, Character and Appearance

- This development seems excessive, especially without major infrastructure improvements as well as being severely detrimental to existing occupiers of the site.
- Impact on the character of the area – high rise tower blocks, increased density of development.
- Deficiencies in social infrastructure – buses, schools, doctors, dentists, etc.
- Insufficient details of supporting infrastructure for a development of this scale.

Impact on Future Occupiers

- Potential conflict with existing businesses – the Thames is a working river.
- Noise from 24/7 operations, it is important the developers design the buildings accordingly.
- Lighting from retained industrial uses.

Flood Risk

- Proposal has not demonstrated that the development could be safely accommodated without harm to flood risk – contrary to Para. 11 (d)(i) of the NPPF (2021).

Surface Water

- No assessment of the impacts of the development on the extent of flooding (as a result of floodwater displacement or impedance of flood flows).

Fluvial (river) flooding

- Modelling Study should have been completed as part of the Flood Risk Assessment, as advised by the Environment Agency.
- Application should not be approved without a Detailed Modelling Study – there could be significant effects on the layout should the detailed modelling show the intended betterment is not feasible or the diversion/deculverting adversely impacts on flood risk off-site.

Ground Water

- No assessment of groundwater flows submitted as part of the proposals to consider rerouting the culverted River Ebbsfleet.

Tidal

- Flood defence will be required to be raised to 8.00mAOD – this is outside of the redline plan.
- Tidal Flooding Data to 2115 does not cover the lifetime of development.

Flood Mitigation Measures

- Depth of flooding does not appear to have been considered thoroughly in the mitigation strategy for the site.
- No strategy for mitigation submitted.
- The Environment Agency recommends that land raising should be considered to contribute to achieving the finished floor level requirements – would need to be considered in light of any updated assessment of fluvial flooding as land raising in the flood extents can displace floodwater and increase risk elsewhere.
- No Flood Warning and Evacuation Plan (as required in paragraph 043 of the NPPG) – taking into account the range of uses across the site as well as the flooding mechanisms posed by the range of sources of flooding identified (surface water, tidal, groundwater and potentially fluvial risk).

Impact on Infrastructure

- Impact on the integrity of the River Ebbsfleet - no clarification on what development is intended to be located within the easement.

Surface Water Drainage

- No consideration of the impacts of climate change on the potential for tide locking on site.
- No consideration on the potential impacts of an exceedance scenario (a tide-locking event coincident with an extreme rainfall event).

- Drainage Scheme relies on flooding of parks during larger return period events – no information on the extent of such features and their function and effect on the design of the scheme and the users.

Open Space

- Insufficient parks and open space provided within a development of this size.

Loss of Biodiversity

- Impact on wildlife habitats / Sites of Special Scientific Interest (SSSI).
- Does not achieve biodiversity net gain.
- Ecological barriers should be designed into the development to protect sensitive areas at Botany Marsh, Robin's Creek and priority habitat mudflats.
- Endangered species.
- Damage to habitat.
- Recreational pressures.

Environment

- More environmentally friendly to retain existing use – the land is likely to be heavily polluted.
- Carbon cost of demolishing industrial buildings and redeveloping is huge.
- Loss of existing business operations would increase road miles, haulage, etc., increasing the impact on the environment.

Transport / Highways Issues

- Traffic generation – including an increase in lorry traffic (river freight often reduces this).
- Local road system inadequate.
- Impact on traffic flow through the A226 and the B2175.
- Increase in pollution.
- Parking provision for cars is not shown on the plans.
- Lack of highway investment has meant highways are dangerous and badly maintained, additional residential uses would make this worse.

Impact on Public Right of Way

Financial Viability

- Financial viability statement not updated despite the changes in the economic climate.

Factual Inaccuracies / Errors in submission

- The financial viability statement appears to give no consideration to properly compensating existing businesses that are being evicted.

Non-Material Planning Considerations

- Limited time available (to read the documents).
- Impacts Arising from Construction Period
 - Noise

- Vibration
 - Dust
- Local people are forced out of the area.
- Redline boundary should be moved away from existing residential dwellings.
- Lack of stakeholder engagement and consultation.
- Personal circumstances.
- Loss of property sale due to proposal.
- Ebbsfleet United FC is running at a loss and in debt – this should be settled before any development is approved.
- Benefit to GBC through business rates to be lost.
- Phasing of development not clear
 - Unclear if business operations could continue whilst Phase 1 works progress – no clarification on this.
 - Unclear if Phase 1 could progress without Phase 2 of the development.

2024 Responses

Support

- Increase housing stock – to meet demand, without damaging and reducing Green Belt land elsewhere.
- Existing area is derelict, neglected and needs regeneration.
- Opportunity to regenerate the area.
- Delay in approval will damage the economy and have a major impact on future projects.
- Secures the future of the Football Club – providing an improved venue, growth, sustainability, attracting more supporters, will ensure football remains a big part of the area, they want a development that enhances the area for local people.
- Ebbsfleet United Football Club brings residents together, the new stadium symbolises a commitment to sports, recreation and also solidifies the club as a community asset.
- Holistic community development.
- Looks fantastic – imaginative planning.
- Development will compliment the adjoining regeneration and development and Ebbsfleet Garden City.
- Homes with green spaces.
- Enhancement to the natural environment – opening up of the Ebbsfleet River.
- Local businesses would get more trade.
- Sporting facilities – the larger stadium could host local community events e.g. athletics, it would enable Wasps Rugby to be resurrected and to flourish.
- Community – improvements and opportunities for more facilities, an area of growth, somewhere to be proud of.
- The football ground would act as a hub to attract clubs and other organisations.
- Achieved at little cost to Gravesham Borough Council and therefore the local taxpayers.
- Economic benefits – financial growth, creates jobs.
- Infrastructure.
- Recreational facilities – social amenities.
- Retail opportunities.
- Provision of nursery.

- Supports the strategic objectives of the local council.
- Encourages investment – close to Ebbsfleet International Station.
- Gives the chance to revive a historic part of the Borough.
- Development appears to reconnect Northfleet to the Thames – hopefully there will be provision for a marina too.
- Environmental improvements.
- With good road and rail access including the M25 and a growing population at Ebbsfleet Garden City, this development needs to go ahead as soon as practically possible.

Objections

Material Planning Considerations

Making Effective Use of Land

- Sufficient brownfield land to meet housing provision targets, without evicting and closing down businesses.
- Inappropriate to class as a brownfield site.

Change of Use / Loss of Existing Businesses

- Closure of businesses.
- The existing is a busy, thriving industrial estate.
- Unemployment.
- Knock on effect for companies that use the product (UK and Worldwide).
- Fundamental change of use including a serious reduction in industrial and commercial property which is already in short supply.
- Existing businesses often provide essential services to local people.
- Loss of specialist skills.
- Uncertain financial future.
- Impact on retained businesses through loss of associated land – including loss of a carpark key to operations of business.
- No evidence that the existing B uses are no longer suited, unviable or have a negative impact on the environment.
- Loss of B Class uses without providing an equivalent number of new jobs and existing premises are fit for purpose and with good levels of occupation – contrary to Policy CS07 of the Local Plan.

Impact on Protected Wharfs

- Critical to maintain the safeguarded wharves to ensure the expected increasing need for the import of aggregate can be met.
- Existing wharf capacity at Northfleet is essential.

Design, Character and Appearance

- Overdevelopment
- Impact on the character of the area through design and high-density.
- Deficiencies in physical infrastructure – Northfleet is not capable of supporting a development of this scale.
- Deficiencies in social infrastructure – buses, schools, doctors, dentists, etc.
- Impact on historic view from Galley Hill.

Impact on Future Occupiers

- Noise from 24/7 operations, it is important the developers design the buildings accordingly.
- Lighting from retained industrial uses.
- Odour impacts from surrounding industrial uses.
- Poor Outlook over industrial uses.

Open Space

- Lack of green open space.

Loss of Biodiversity

- Impact on wildlife habitats / Sites of Special Scientific Interest (SSSI).
- Damage to habitat.
- Recreational pressures.

Environment

- More environmentally friendly to retain existing use – the land is likely to be heavily polluted.

Transport / Highways Issues

- Impact on the Highway Network.
- Local road system inadequate.
- Parking issues.
- Operation of retained industrial uses would impact on the highway network – HGVs queuing to enter businesses.
- 24/7 access required to retained businesses for emergency services.

Impact on Infrastructure

- There are other developments nearby – infrastructure does not appear to have been taken into account.

Factual Inaccuracies / Errors in submission

- Highway proposals do not take into account closure of A226 which would impact on the development if not completed in time.
- The financial viability statement appears to give no consideration to properly compensating existing businesses that are being evicted.

Non-Material Planning Considerations

- Local residents in support have not viewed the proposal in detail.
- Impacts arising from construction period.
- Local people are forced out of the area.
- Lack of stakeholder engagement and consultation.
- Redline boundary - should be moved away from existing residential dwellings - no reason why it should include Ebbsfleet Business Park.
- Concerns about the number of reserved matters along with the time it is taking for the application to be dealt with which causes uncertainty, disruption and cost.
- Limited time available (to read the documents) – further comments may be made.
- Personal circumstances.

- Phasing of development not clear
 - Unclear if business operations could continue whilst Phase 1 works progress – no clarification on this.
 - Unclear if Phase 1 could progress without Phase 2 of the development.