

Reference: EDC/24/0049

Site Address: The Hub, Alkerden, Whitecliffe, Ebbsfleet Valley, Swanscombe, Kent

Proposal: Reserved matters application (details relating to access, appearance, landscaping, layout and scale) pursuant to condition 2 and 25 of outline planning permission EDC/17/0048 for a health facility, lifelong learning centre, multi-use hall and ancillary spaces together with associated infrastructure including landscaping, car and cycle parking and ancillary works.

Applicant: Eastern Quarry Ltd

Parish / Ward: Ebbsfleet

SUMMARY:

This application seeks approval of reserved matters in relation to access, appearance, landscaping, layout and scale for the erection of a community hub building within Alkerden Market Centre, at the heart of the Eastern Quarry (also known as Whitecliffe) development site. The scheme includes space to facilitate a health centre, lifelong learning centre including services to be operated by KCC such as youth services and adult education, a library, 200-person capacity hall to include space for multi-faith religious groups and accommodation for Kent Police. The building would be located in a prominent site within a highly sustainable location on the Fastrack corridor, with flexible internal spaces to serve the emerging needs of the expanding community which extend well beyond the obligations as set out in the outline planning permission. The applicant has undertaken extensive engagement with local groups and relevant potential future operators to deliver spaces which are fit for purpose.

The application has been guided by a series of strategy documents and principally the Area Masterplan and Design Code (AMP) which set out design parameters for delivery of detailed consents and set the standards against which all reserved matters applications in Alkerden Village are assessed. The scheme accords with the objectives of the AMP and is compliant with Building for Healthy Life, achieving a high score of 10 greens and 1 amber.

The site has been well laid out, meeting accessible design in accordance with best practice and Design for Dementia assessments. The architectural narrative, derived from Ebbsfleet's industrial heritage and the materiality of its chalk cliff landscapes, aligns with the Design for Ebbsfleet character guide and delivers a high-quality, bespoke appearance to the building that reflects its civic role and will be characterful and distinctive in its setting at the heart of Alkerden Market Centre.

The landscaping scheme maximises provision of breakout spaces where possible and delivers a welcoming plaza entrance from the principal elevation on the Fastrack corridor. A well-considered parking strategy has been developed given the sustainable location, balancing identified demand with the promotion of active travel methods. The building would deliver a good level of sustainability, with pre-construction assessments identifying a BREEAM 'Excellent' rating, delivered through a fabric first approach and addition of features including PV panels and green roof coverage.

The applicant has worked well with EDC officers to design a carefully considered and extremely well resolved building, both internally and externally, which complies with local and national policy, the objectives of the Ebbsfleet Implementation Framework, EDC's design assessment framework, the outline planning permission and the Alkerden Area Masterplan to deliver a distinctive centrepiece with Alkerden Market Centre.

RECOMMENDATION:

Authority be delegated to the Director of Planning and Place to approve the application and issue reserved matters approval, subject to the imposition of the planning conditions as set out below, with delegated authority to the Director of Planning and Place to make minor changes to the wording:

PLANNING CONDITIONS

Time limit

1. The development hereby permitted shall be begun before the expiration of two years from the date of this reserved matters approval.

Reason: For the avoidance of doubt and to ensure the development is brought forward within a specified time scale.

Approved Plans and Documents

2. The development hereby permitted shall be carried out in accordance with the following plans:

Layout Plans

- Site Context Plan (DE_229F_L_RM_011)
- Site Location Plan (DE_229F_L_RM_010)
- Proposed Site Plan (HEN-EEQ-RMA4_HTA-A_DR_0101 Rev P2)
- Proposed Location Plan (HEN-EEQ-RMA4_HTA_DR_0100 Rev P2)

Floor Plans

- Level 00 (HEN-EEQ-HUB-HTA-XX-00-DR-A-0200, Dated 12/09/24)
- Level 01 (HEN-EEQ-HUB-HTA-XX-01-DR-A-0201, Dated 06/09/24)
- Level 02 (HEN-EEQ-HUB-HTA-XX-02-DR-A-0202, Dated 06/09/24)
- Level 03 (HEN-EEQ-HUB-HTA-XX-03-DR-A-0203, Dated 06/09/24)
- Roof Plan (HEN-EEQ-HUB-HTA-XX-04-DR-A-0204, Dated 06/09/24)

Elevations & Sections

- Proposed Site Sections (HEN-EEQ-RMA4_HTA-A_DR_0110 Rev P1)
- Proposed Section AA (HEN-EEQ-RMA4_HTA-A_DR_0210 Rev P1)
- Proposed Section BB (HEN-EEQ-RMA4_HTA-A_DR_0211 Rev P1)
- Proposed Section CC (HEN-EEQ-RMA4_HTA-A_DR_0212 Rev P1)
- Proposed Section DD (HEN-EEQ-RMA4_HTA-A_DR_0213 Rev P1)
- Proposed Section EE (HEN-EEQ-RMA4_HTA-A_DR_0213 Rev P1)
- Proposed South Elevation (HEN-EEQ-RMA4_HTA-A_DR_0220 Rev P2)
- Proposed East Elevation (HEN-EEQ-RMA4_HTA-A_DR_0221 Rev P2)
- Proposed North Elevation (HEN-EEQ-RMA4_HTA-A_DR_0222 Rev P2)
- Proposed West Elevation (HEN-EEQ-RMA4_HTA-A_DR_0223 Rev P2)
- Proposed Bay Studies (HEN-EEQ-RMA4_HTA-A_DR_0230 Rev P2)

Highways

- Parking Layout (210932-06)

Landscaping

- Landscape Plan (DE_229F_L_RM_001 Rev A)

Drainage

- Proposed Drainage Site Layout (4655-MOM-XX-XX-DR-C-60000 P01)
- GA Plan Proposed Drainage Storm Water Layout (4655-MOM-XX-XX-DR-C-61000 P01)
- GA Plan Proposed Drainage Foul Water Layout (4655-MOM-XX-XX-DR-C-62000 P01)

Reason: For the avoidance of doubt and to ensure a satisfactory form of development.

Pre-commencement

3. **Vegetation Clearance** - No development shall take place until vegetation within the site has been cleared under an ecological watching brief, and a letter from a suitably qualified professional confirming that this has taken place, and the date of when the works were undertaken, has been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of biodiversity, nature conservation and enhancement, in accordance with Dartford Plan Policy M14.

Prior to Development Above Ground Floor Slab Level

4. **External Materials** - Notwithstanding the details set out in the approved plans, no development above ground floor slab level shall take place until details (including samples) of materials and products, including finishes, of external materials to be used on the building hereby approved have been submitted to and approved in writing by the Local Planning Authority. These shall include (but are not limited to):
 - a) Grey facing brick with light/white mortar;
 - b) Parapet coping;
 - c) Green aluminium window frames, doors and cills;
 - d) Orange aluminium entrance doorsets;
 - e) Green fluted accent tile cladding;
 - f) Brass colour metal balustrading / railings;
 - g) Green metal canopies; and
 - h) Ancillary external items including vent grilles, rainwater pipes.

Sample panels of building facades shall be provided, the detail and size of which shall be agreed with the Local Planning Authority in advance.

The development shall be carried out in accordance with the approved details.

Reason: To secure high-quality design and detailing and to ensure that materials will make an acceptable contextual response, resulting in the satisfactory appearance of the development in accordance with Dartford Plan Policy M1.

5. **Detailed Drawings** - Notwithstanding the details set out in the approved plans, no development above ground floor slab level shall take place until detailed drawings (at 1:20 scale) for the following have been submitted to and approved in writing by the Local Planning Authority:

- a) Details of the roof envelope including roof edges, parapets, copings, and rooftop plant screening, etc;
- b) Detailed brick elements including mortar joint profile for all masonry bay types, including recessed brick panel to health centre;
- c) Design of metal railings to be installed along the roofline;
- d) Detailed drawings of all types of all door and window openings within the masonry facade, including plans and sections @ 1:20 of heads, jambs and sills.
- e) Glazing system to entrances on south elevation including section through;
- f) Canopies above doors including method of affixing; and
- g) Form and appearance of Hub signage to be installed in the front plaza.

The development shall be carried out in accordance with the approved details.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Dartford Plan Policy M1.

6. **Soft Landscape Details** - Notwithstanding the details set out in the approved plans, no development above ground floor slab level shall take place until a soft landscaping scheme, which shall accord with the submitted Landscape Plan (DE_229F_L_RM_001 Rev A), has been submitted to and approved in writing by the Local Planning Authority. Details shall include:

- a) Planting Plans at 1:200 scale or similar for the whole scheme including details of the numbers of all trees, hedges and shrubs to be planted, together with a planting schedule providing pot sizes, heights, spreads and densities and total quantities of individual species. A minimum of 25% of soft planting shall be native species;
- b) Details of tree planting in relation to underground services and lighting, including details of any root barriers and below ground root cells and a plan demonstrating adequate soil volumes can be achieved for all new trees (in particular for the native oak tree and others within the car park). Details shall demonstrate there will be no overall reduction in tree numbers across the site than shown on the submitted Landscape Plan;
- c) Details of soft planting to be included on the second floor outdoor roof amenity area;
- d) A site wide landscape management plan, covering all soft landscape elements, with detailed management schedules, timings and frequencies for each identified prescription, which shall include maintenance of trees either side of the vehicular entrance to avoid overhanging of the cycleway.

The soft landscaping shall thereafter be maintained in accordance with the approved Landscape Management Plan.

Reason: To ensure a satisfactory appearance to the development, in the interests of biodiversity and in the interests of future residential amenity in accordance with Dartford Plan Policies M1, M2 and M14.

Informative: The applicant is reminded that condition 65 of outline permission EDC/17/0048 requires detailed landscaping schemes to be implemented during the first planting season following completion of the relevant area of the development and shall thereafter be maintained for a period of five years. Any trees, shrubs or grassed areas which die, are diseased or vandalised within this period shall be replaced within the next planting season.

7. **Hard Landscape Details** - Notwithstanding the details set out in the approved plans, no development above ground floor slab level shall take place until details and samples of the proposed hard landscaping have been submitted to and approved in writing by the Local Planning Authority. These details shall substantially accord with the details illustrated and annotated on the approved drawings and include the following details:
- a) Hard surfacing materials to be used in the external finishes of all roads, footpaths, courtyards, parking spaces, plaza fronting Fastrack to include size, material, laying pattern and colour finish, together with specification of edging and kerbs;
 - b) Full product specifications of all street furniture including proposed benches, chairs and tables, planters, external lighting, covered cycle shelters (which shall incorporate lighting in the interests of safety), cycle stands, litter bins, bollards required to prevent mopeds or similar from accessing pedestrian routes. Details shall include location of all items to demonstrate there will be no obstruction to building access particularly for wheelchair users and buggies. Construction details should also be provided of the bespoke seating units, raised planters and steps.
 - c) Details of markings to demarcate parking bays, enlarged spaces (such as the delivery and ambulance bays) and internalised pedestrian pathways or crossings within the proposed car park.
 - d) Details of all boundary treatments and gates to include proposed materials and finish and images to be provided (technical drawings or manufacturer's details);
 - e) A site wide landscape management plan, covering all hard landscape elements, with detailed management schedules, timings and frequencies for each identified prescription.

The development shall be carried out in accordance with the approved details prior to first use of the building hereby permitted and shall be retained thereafter.

Reason: In order to ensure an acceptable and functional standard of development upon completion, and in the interests of visual amenity, in accordance with Dartford Plan Policy M1.

Informative: It is recommended a joint landscape management plan is provided to incorporate details for both condition 6d) and condition 7e).

8. **Electric Vehicle Charging** - No development above ground floor slab level shall take place until details of electric vehicle charging facilities have been submitted to and approved in writing by the Local Planning Authority. Details shall show at least 10% (5no. spaces) of the approved parking spaces as active charging spaces (with a minimum output rating 7kW- Mode 3, AC) and at least an additional 10% (5no. spaces) of parking spaces as passive charging spaces (i.e. wiring and cable conduit in place under the car park for future use). Details of the location, design and type (single/double) of charging point shall be provided for the active charging spaces.

The development shall be carried out in accordance with the approved details and the approved works shall be carried out and installed prior to first use of the building hereby approved.

Reason: In the interests of good design and sustainable travel, in accordance with Dartford Plan Policy S3.

9. **External Lighting** – Notwithstanding the details set out in the submitted documents, no development above ground floor slab level shall take place until a detailed external lighting scheme has been submitted to and approved in writing by the Local Planning Authority. These details should accord with the principles as set out in the submitted External Lighting Statement by Skelly & Couch (1639 Rev 2.0). The scheme shall include:

- a) functions of proposed lighting and the uses it supports (e.g. wayfinding, amenity);
- b) a horizontal lux plan showing all proposed lighting;
- c) details of time limits on lighting and hours of operation;
- d) details of how the lighting scheme will mitigate any potential biodiversity impacts arising from the installation or operation of the proposed lighting (particularly in relation to bat and bird bricks and boxes being brought forward as part of the development);
- e) details of fixtures, any supporting structures, and systems of control such as timers and sensors including surface finish and colour; and
- f) details on colour temperature of the lighting and the associated public realm surfaces including reflectivity and glare.

The development shall be carried out in accordance with the approved plans and implemented prior to first use of the area to which they relate and shall thereafter be retained at all times.

Reason: To ensure a satisfactory appearance to the development and secure an appropriate level of lighting which will conserve and enhance the amenity of residents, neighbours, and wildlife habitats in accordance with Dartford Plan Policies S3.

10. **Sustainability** - Notwithstanding the details set out in the approved plans and documents submitted with the application, no development above ground floor slab level shall take place until details of the following sustainability measures have been submitted to and approved in writing by the Local Planning Authority:

- a) Confirmation of the extent of PV panels and green roof with commitment to maximise opportunities to provide a bio-solar roof (i.e. PV mounted on the green roofs). The layout of the green roof should be rectilinear in form, avoiding narrow channels, and should be no less than 283sqm (21% of roof area) of the total area of the roof as a minimum;
- b) Full details of the specification of the green roof including details of the component layers and, in particular, the type of vegetation at planting level;
- c) Full details of a rain garden within the parking area to be provided, including cross sections, drainage and planting details;
- d) Details of the Variable Refrigerant Flow (VRF) system including information regarding operation which shall be installed so as to include controls which do not allow cooling and window opening in the same room at the same time. All

windows within the approved building will be openable unless otherwise agreed; and

- e) Provision of shower facilities within the Lifelong Learning Centre to enable use for those arriving by bicycle.

The approved details shall be implemented in full prior to the first use of the building and shall thereafter be retained and maintained in working order at all times.

Reason: To ensure the sustainable development of the site and deliver sustainable travel objectives in accordance with Dartford Plan Policies S3 and M16.

Informative: The applicant is advised to avoid the use of sedum for the planting layout of the green roof as this offers minimal biodiversity benefits.

11. **Ecological Enhancements** - No development above ground floor slab level shall take place until details of ecological enhancements within the site have been submitted to and approved in writing by the Local Planning Authority. In accordance with the submitted Ecology Statement by Middlemarch (RT-MME-162228-01 Rev B), the details shall include the following:

- a) Location and details of 5no. bird boxes/bricks which should be the integrated swift boxes or bricks such as the Ibstock Swift Eco Habitat – 3, or similar; and
- b) 5no. bat bricks/boxes to be incorporated across the site and on the building.

The development shall be carried out in accordance with the approved details prior to first occupation of the building and shall be retained thereafter.

Reason: In the interests of biodiversity, nature conservation and enhancement, in accordance with Dartford Plan Policy M14.

Prior First Use

12. **Travel Plan** - No part of the building hereby approved shall be brought into use until a full Travel Plan to reduce dependency on the private car has been submitted to and approved in writing by the Local Planning Authority. The full Travel Plan shall substantially accord with the Travel Plan by The Transportation Consultancy (210932-04) submitted with the application and shall include (but not be limited to) the following details:

- a) Objectives and modal-split targets for staff and visitors;
- b) A programme of implementation;
- c) Details of the Travel Plan Co-Ordinator(s) appointed for The Hub and their contact details;
- d) Details of travel surveys to accurately identify the travel patterns of users to the site;
- e) Measures to encourage sustainable travel to and from the site including any incentives;
- f) Details of a marketing strategy to promote the Travel Plan;
- g) Effective measures for the on-going monitoring, review and improvement of the Travel Plan.

Changing facilities, shower facilities and lockers shall be provided prior to the first use of the building hereby approved.

Thereafter, the Travel Plan shall be kept under review by the operator every 12 months (as a minimum) for a period of 5 years from first occupation of any part of the building and shall be made available to the Local Planning Authority for review as required. Any updates or amendments that may be required as a result of the review shall be embedded within an updated Travel Plan and implemented accordingly. The latest version of the Travel Plan shall be implemented throughout the lifetime of the development.

Reason: In order to relieve demand on parking and encourage sustainable travel methods in accordance with sustainable planning principles and Dartford Plan Policies M15 and M16.

13. **Parking Management** - No part of the building hereby approved shall be brought into use until a detailed Parking Management Plan informed by the Framework Parking Management Plan by the Transportation Company (ref. 210932-06 dated May 2024) submitted with the application has been submitted to and approved in writing by the Local Planning Authority.

The Parking Management Plan shall include (but not be limited to) the following, with the aim of achieving appropriate use of the car parking area and the prevention of displacement parking onto nearby streets:

- a) Details of how parking spaces will be allocated and managed, including duration of stay (including a waiting restriction on the delivery bay), timing of return and management of parking within EV charging spaces to prevent use by other individuals. Details will be based on a revised parking demand forecast and accumulation assessment based upon the final users/operations and will include consideration of spaces to be utilised for school drop-off/pick-up together with any associated directional signage for users.
- b) Details of management and private enforcement to be secured in perpetuity, including control of inappropriate parking across the site, informal parking outside of allocated parking spaces and exceedance of time limits by individual vehicles;
- c) Details of arrangements for the management and maintenance of electric vehicle charging points;
- d) Arrangements for management and alternative parking arrangements to facilitate larger events that might attract a large number of vehicles;
- e) Hours of use of the parking;
- f) Considerations for provision of scooter parking;
- g) Details of how minibus access/parking would be facilitated; and
- h) Arrangements for monitoring and reviewing.

The development shall be carried out in accordance with the approved details

The Parking Management Plan shall be made available to the local planning authority for review as required. Any updates or amendments that may be required as a result of the review shall be embedded within an updated Parking Management Plan and implemented accordingly.

Reason: To ensure effective management and prevent over-provision of parking spaces in the interests of good design and sustainable travel in accordance with Dartford Plan Policies M15 and M16.

14. Highway Measures – No part of the building hereby approved shall be brought into use until the following have been provided in full on site and have been surfaced, drained and marked out (where relevant):

- a) Vehicle and pedestrian visibility splays as shown on Drawing Number 210932-03 Revision A with no obstructions over 0.6 metres above carriageway level within the splays;
- b) 42no. vehicle parking spaces, including 4no. accessible parking spaces, together with 1no. large vehicle/van space and 1no. ambulance space, as shown on Drawing Number HEN-EEQ-RMA4_HTA-A_DR_0101 Revision P2; and
- c) 41no. secure and sheltered cycle spaces, including 2no. accessible cycle spaces, as shown on Drawing Number DE_229F_L_RM_001 Revision A.
- d) Turning areas as identified in Appendix C of the submitted Transport Assessment by The Transportation Consultancy (210932-03)

The provisions listed in a) to d) above shall thereafter be retained and maintained on site at all times.

Thereafter, notwithstanding the provisions of the Town and Country (General Permitted Development) (England) Order 2015 (as amended), or any provision equivalent to it in any statutory instrument revoking and re-enacting that Order, no development shall be carried out on the site in such a manner or in such a position as to preclude the use of or access to the provisions listed in a) to d) above.

Reason: In the interests of highway safety and sustainable travel in accordance with Dartford Plan Policies M15 and M16.

15. Community Building Management Plan – No part of the building hereby approved shall be brought into use until a detailed Community Building Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall accord with and add detail to the overarching principles established in the Management and Maintenance Framework submitted with the application (received May 2024) and shall include details of the objectives set out therein will be achieved, including the following:

- Management aims and objectives;
- Operators / Use of the spaces to prioritise uses as identified in the Community and Leisure Facilities Strategy (approved under the outline planning permission), or alternative uses supported by relevant justification;
- Hours of use including opening to the public;
- Internal access arrangements;
- Arrangements for booking the facilities and a user charging schedule (which shall cover comparisons with other facilities in the area);
- Means and frequency by which the facilities will be communicated / marketed to the local community;
- A complaints procedure; and
- Arrangements for monitoring, reporting and reviewing the Plan, to include annual reporting of the extent of usage of the facilities to be made available to the Local Planning Authority.

The Plan shall be made available to the Local Planning Authority for review as required. Any updates or amendments that may be required as a result of the

reviews shall be incorporated within an updated Community Building Management Plan and implemented accordingly.

The building shall thereafter be managed and operated in accordance with the latest approved Community Building Management Plan at all times.

Reason: In order to regulate and control the use of the building in the interests of safeguarding amenity, delivering the requirements of the outline planning permission and providing flexible community uses in accordance with Dartford Plan Policies M2 and M17.

16. **Noise** - No part of the building hereby approved shall be brought into use until details of the design and implemented sound attenuation measures in connection with the plant to be installed on the roof of the building have been submitted to and approved in writing by the Local Planning Authority. The details must demonstrate that the operating noise level (including required acoustic character corrections, if applicable) achieves the proposed noise limits as set out in the submitted Noise Assessment by Sandy Brown (ref. 023938-R01-E dated 2 May 2024) through validation testing once the plant is installed and operational. The plant and any associated sound attenuation measures shall be retained thereafter and maintained in good working order. The plant shall not be operational outside the opening hours of the building hereby approved.

Reason: In the interest of protecting public amenity, in accordance with Dartford Plan Policy M2.

17. **Broadband** – No part of the building hereby approved shall be brought into use until an operational broadband connection with gigabit capability has been provided to all serve all parts of the building.

Reason: In the interests of effective operation and sustainability.

Informative: For clarification, gigabit capability means faster than average broadband speeds, allowing download speeds of 1 gigabit.

Prior to Installation

18. **Extraction Flue** – Prior to installation, details of a system for the extraction and treatment of cooking fumes, including details for the control of noise, vibration and odour from the system and details of the position and appearance of any external flue, have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented before the development to which the details relate is brought into use and thereafter be maintained in accordance with the approved details. No cooking of food shall take place unless the approved extraction system is being operated.

Reason: In the interest of protecting amenity, in accordance with Dartford Plan Policy M2.

Other / Compliance

19. **Use of Building** - Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order amending, revoking and re-enacting that Order with or without modification) the building hereby approved shall be maintained with a minimum floor area of

1,028sqm GIA for purposes relating to health falling within Use Class E(e) of the Town and Country Planning (Use Classes) Order 1987 (as amended), unless planning permission has been granted on an application relating thereto. The remainder of the building floorspace shall only be used for purposes in relation to uses falling within Use Classes E(d)(e)(f)(g(i)), F.1(a)(b)(c)(d)(e)(f) and F.2(b) of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Reason: In order to regulate and control the use of the building in the interests of safeguarding amenity, delivering the requirements of the outline planning permission and providing flexible community uses in accordance with Dartford Plan Policies M2 and M17.

20. **Servicing and Deliveries** – The development will be carried out in accordance with the objectives and requirements as set out in the submitted Delivery and Servicing Plan by The Transportation Consultancy (210932-05). The monitoring plan set out in section 5 of the submitted Servicing and Deliveries Plan shall be carried out and its results shall be made available to the Local Planning Authority for review as required. Any updates or amendments that may be required as a result of the review shall be embedded within an updated Servicing and Deliveries Plan and implemented accordingly.

Reason: To protect the amenity of existing and proposed noise sensitive receptors in the surrounding area and in order to regulate and control the use of the building in the interests of safeguarding amenity and preventing highway and adverse parking impacts in accordance with Dartford Plan Policies M2, M15 and M16.

21. **BREEAM** - The building hereby approved shall achieve BREEAM level 'Excellent' in accordance with the requirements of BREEAM (or such equivalent national measure of sustainability for non-residential design that may replace that scheme from time to time) to include achieving the targeted water credits as set out in the Sustainable Design and Construction Statement by Twin & Earth (dated May 2024 ref. TE0610) submitted with the application.

A BREEAM post-construction review shall be undertaken confirming the BREEAM rating achieved for the building and shall be submitted to the Local Planning Authority within 6 months of the building first being brought into use.

Reason: To ensure that the development meets the objectives of energy efficiency in new building design and construction pursuant to Dartford Plan Policy M3.

INFORMATIVES:

1. ADDITIONAL DOCUMENTS

The following documents have been considered in the assessment of this application:

- Planning Statement by CBRE (May 2024)
- Design & Access Statement (HEN-EEQ-RMA4_HTA-A_R_0700 Rev P1)
- Design & Access Statement Addendum (HEN-EEQ-RMA4_HTA-A_R_0701 Rev P1)
- Accommodation Schedule (HEN-EEQ-RMA4_HTA-A_S_0800 Rev P1)
- Statement of Community Involvement by Pillory Barn (Dated April 2024)
- Planning Gateway One Fire Statement by BB7 Consulting Ltd (16961BC)
- Below Ground Drainage Planning Report by Momentum (4655_MOM_ACH_RPT_Below Ground Drainage Planning Report_00)
- External Lighting Statement by Skelly & Couch (1639 Rev 2.0)

- Noise Assessment by Sandy Brown (023938-R01-E)
- Transport Assessment by The Transportation Consultancy (210932-03)
- Travel Plan by The Transportation Consultancy (210932-04)
- Delivery and Servicing Plan by The Transportation Consultancy (210932-05)
- Framework Parking Management Plan by The Transportation Consultancy (210932-06)
- Highways Consultation Response by The Transportation Consultancy (September 2024)
- Management and Maintenance Framework (received 30 May 2024)
- Daylight Assessment by Skelly & Couch (1639 Rev 2.0)
- Energy Strategy by Skelly & Couch (1639 Rev 2.0)
- Low & Zero Carbon Feasibility Study by Skelly & Couch (1639 Rev 2.0)
- Overheating Assessment by Skelly & Couch (1639 Rev 2.0)
- Passive Design Analysis by Skelly & Couch (1639 Rev 2.0)
- Sustainable Design and Construction Statement by Twin & Earth (TE0610)
- RMA 4 - The Hub - EDC Sustainability Matrix
- Statutory Consultee Response Note EDC/24/0049 by Skelly & Couch (1639 Rev 4.0)
- Ecology Statement by Middlemarch (RT-MME-162228-01 Rev B)
- Impact Shadow Assessment by Sunlight Assessments UK (Draft V3 received 30 May 2024)

2. HIGHWAYS

The applicant's attention is drawn to the comments from Kent Highways & Transportation and the need to consult KCC to review detailed designs and any road safety audits that may be carried out in the future.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissionsand-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissionsand-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

3. SIGNAGE

It is acknowledged indicative details of the position of signage has been provided on the approved plans. The applicant is advised that full details of signage will need to be considered under the Advertisement Regulations and a separate application submitted, as necessary.

4. OUTLINE PLANNING PERMISSION

The applicant is reminded that this decision is an approval of reserved matters pursuant to an outline planning permission and that the conditions attached to the outline planning permission must also be complied with.

5. BUILDING REGULATIONS AND OTHER CONSENTS

This decision does not imply any consent, which may be required under the Building Regulations or under any other enactment or provision. Nor does it override any private rights which any person may have relating to the land affected by this decision, including the provisions of the Party Wall etc. Act 1996.

6. NAMING AND NUMBERING

Your attention is drawn to the need to contact Dartford Borough Council's Street Naming and Numbering Officer in order to have the new building formally addressed.

7. 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/agent was provided with pre-application advice;
- The applicant/agent was advised of planning issues during the processing of the application and additional information has been submitted to address these; and

- The application was determined within the relevant timescales in accordance with an extension of time agreement.

8. REASON FOR IMPOSITION OF PRE-COMMENCEMENT CONDITION

Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the Local Planning Authority is satisfied that the requirements of planning condition 3 (including the timing of compliance) is so fundamental to the development permitted that such details must be submitted prior to works commencing on site. In accordance with The Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the imposition of this pre-commencement condition has been agreed in writing with the applicant.

1.0 **SITE CONTEXT AND PROPOSAL**

Site Context

- 1.1 The application site is formed of an area of brownfield land situated within the Eastern Quarry (EQ) strategic development site in Ebbsfleet garden city.
- 1.2 EQ, which measures some 270ha in area, is bounded by the A2 to the south, the B255 and Bluewater shopping centre to the west, Alkerden Lane and the settlements of Greenhithe and Swanscombe to the north and Southfleet Road and the former Northfleet West Sub Station development site (known as Ebbsfleet Green) to the west and southwest.
- 1.3 Outline planning permission was granted for EQ in 2007 for up to 6,250 dwellings together with 33% associated open space and up to 231,000 square metres of built floorspace for business premises; education community & social facilities; hotels; theatre; supporting retail and leisure facilities. All matters were reserved for later consideration. The outline consent was varied in 2013 to allow for a change in land disposition across the site. A second variation to the outline approval was granted in March 2018 to allow alterations to parameter plans reflecting an update in land levels and land use disposition.
- 1.4 The masterplan for EQ takes the form of three connected villages. The first village to come forward is Castle Hill to the east. With the exception of some small discrete parcels of land, detailed consent has been granted across Castle Hill for 1,610 dwellings and is largely complete. The focus for development now falls to the central and western villages. Details have been approved for a total of 518 dwellings in Ashmere village to the west through a joint venture between Vistry (formerly Countryside) and Clarion Housing, with occupations in Phase 1 complete, construction progressing on Phase 2 and an application recently submitted for Phase 3 consisting of 215 units.
- 1.5 The central Alkerden village, which forms the commercial and community heart of EQ, has permission for an education campus, which is undergoing construction. Detailed approval has also been given for 868 dwellings across Alkerden with construction commencing by Bellway on Parcel 5a and Westerhill on Parcel 5b in the northern section of the village, and Redrow progressing on their first phase to the south of the village. In total there are approximately 2,094 completions across EQ at this time.

Application Site

- 1.6 The application site is located in the middle of Alkerden Village, forming part of the 'Alkerden Market Centre' as identified in the Area Masterplan (AMP). The Market Centre has been divided into four parcels according to the nature of delivery and development partners. Permission has been granted for a mixed-use scheme incorporating a supermarket in the first phase of Alkerden Market Centre. As previously mentioned, work has commenced on the Education Campus. Remaining parcels immediately to the north and south/southeast are yet to come forward.
- 1.7 The area of the site is 0.416ha. It measures approximately 55m from north to south and 70m from east to west. The application site is irregular in shape owing to its location on the corner of a major junction between the Fastrack corridor immediately to the south and Primary Street, which includes segregated cycleway and footway, immediately to the east (the detailed design for both being secured under separate RMAs) together with the division of the remainder of the parcel into two adjacent sub-parcels to the north (Parcel 4A) and west (Parcel 4B). Pre-application discussions are underway for extra care accommodation in the sub-parcel immediately to the west. Pre-application for the sub-parcel to the north is on hold while options are being considered by the developer.

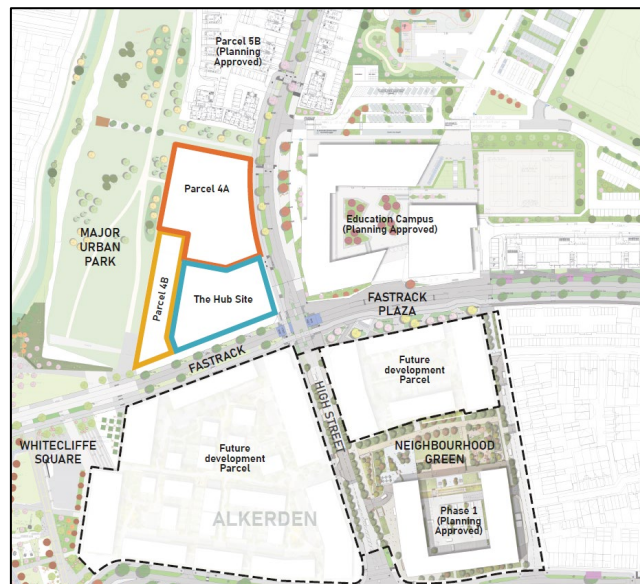


Figure 1: Site location – outlined in blue

- 1.8 Former quarrying activity at EQ has created a dramatic landscape with steep chalk cliffs around perimeter. Much of the former quarry has been backfilled with Thanet Sand over the worked chalk but there are still considerable land level differences between the quarry floor and the site's surrounding areas. Earthworks for Alkerden have previously been approved under a separate planning application for advance infrastructure and these works have been undertaken at the site to form the development platform. The site levels fall from northeast to southwest by some 5m which must be accommodated within the design of the building and surrounding ancillary space.
- 1.9 The site is located in a highly sustainable location at the centre of the middle village which, as its name 'Market Centre' suggests, will form the heart of the wider development site, providing the principal commercial and community services for residents, including the approved education campus featuring primary and secondary schools with dual-use sports facilities. It is extremely well-connected to the Fastrack corridor as well as the wider road and cycling network. It also in close proximity to the

major urban park public open space which is masterplanned between Alkerden and Ashmere villages to the west of the site.

Proposal

- 1.10 The application seeks approval of all reserved matters (access, appearance, layout, scale and landscaping) pursuant to the extant outline permission for EQ for the construction of a multi-purpose community hub (the 'Hub'), constructed as a single building. The Hub would deliver obligated s106 and conditional requirements pursuant to the outline planning permission for Eastern Quarry, together with other spaces and services to create a vibrant, flexible space of co-located services to serve the local community.
- 1.11 Although no contracts have yet been entered into, the applicant has been working closely with anticipated end users of the building including the Ebbsfleet Garden City Trust (EGCT), the Integrated Care Board (ICB) and Kent County Council (KCC) to design a building which meets the needs of the end users. Extensive community engagement has also been undertaken.
- 1.12 The proposed building would consist of a health facility to be located to the western half of the building over two floors and a Lifelong Learning Centre (LLLC) to the eastern half consisting of a 2-storey section in the centre of the building and 3-storey section to the western corner, at the junction of the Fastrack corridor and the Primary Street. A detailed breakdown of the spaces and how the building delivers requirements of the outline planning permission is set out in the appraisal section below but broadly the Hub would provide the following:
- Health Facility
 - KCC Lifelong Learning Centre
 - Social Care Space
 - Police Accommodation
 - Job Centre
 - Multi-purpose Hall including use as a Religious Facility
 - Library
 - Multi-purpose Studios
 - Co-working Spaces
 - Family Hub
 - Café
- 1.13 The proposals also include delivery of an external landscaped parking area associated with the Hub to the rear (north) of the proposed building, accessed from the Primary north-south street. This car park would provide parking for the Hub as well as a provision for the Education Campus opposite, as required by a Legal Agreement secured in association with the relevant reserved matters approval for the Campus (reference EDC/20/0002).
- 1.14 Although yet to be finalised, it is intended the Ebbsfleet Garden City Trust (EGCT) will be the freeholder of the Hub and will manage the building on a series of lease agreements or use/hire agreements to relevant bodies such as the ICB, KCC and private businesses and operators to utilise the spaces. The operating model will offer some fixed, regular leased/licensed/hireable spaces as well as standard flexible/seasonal hire options.

- 1.15 Pursuant to condition 25 of the outline permission for EQ, which requires the submission of details to be provided with any RMA, details of the following sections in relation to the condition have been provided in the submission and will be discussed in the appraisal below:
- a) Updated area plan
 - b) Landscaping
 - c) Materials
 - d) Street lighting and furniture
 - e) Boundary treatment
 - f) Surface finishes and hard landscaping
 - h) External lighting (not street lighting)
 - j) Cycle Parking
 - m) Internal layout of community facility building
- 1.16 The schedule of open spaces as required by part g) of Condition 25 of the outline permission lies outside the red line boundary of the application site, being delivered to the west in the form of the Major Urban Park. In addition, details relating to part k) television receivers and l) Signage and interpretation are also not relevant to this application.
- 1.17 A strategy for Public Art has been identified in the AMP for Alkerden including potential locations which lie outside this parcel. Details relating to public art as required by part i) of condition 25 is therefore not relevant to this application. It should be noted, however, that opportunities for the provision of public art had been raised with the applicant as a suitable location given the nature of the use of the site. While some engagement had been undertaken by the developer to identify a brief for public art within the site, this has not been developed further. The applicant has now identified that the scope is now proposed within the internal fabric of the building rather than the external and further details on the public art provision will come forward during the detailed design stage in collaboration with relevant interested parties. Since it is not a requirement of the OPP, this has not been pursued further.
- 1.18 In accordance with condition 28 of the outline permission, a noise assessment has been submitted to support the RMA.
- 1.19 Condition 29 of the outline permission requires the submission of details of any telecommunication masts proposed relating to the area they are located within, so far as possible. Installation of telecommunications equipment is to be delivered by the site wide landowner (Henley Camland). None are proposed in this phase so this is not applicable to this application.

2.0 RELEVANT PLANNING HISTORY

Outline Planning Permission

- | | | |
|-----|-------------|--|
| 2.1 | EDC/17/0048 | S73 application for the variation of conditions of DA/12/01451/EQVAR relating to parameter plans and strategies. Approved 28.03.18 |
|-----|-------------|--|

N.B. The outline planning permission reserved all matters for future development but fixed certain elements including a Land Use Disposition Plan, several high-level strategies (covering landscape, design, phasing, public art, community participation, community and leisure facilities, sustainable development, education and transport)

and a s106 Agreement, which form a framework for the development as it comes forward.

Subsequently, a series of other strategies have been approved by condition pursuant to outline planning permission which include:

- Site Wide Masterplan
- Alkerden Area Masterplan & Area Design Code
- Waste Management Plan
- BAP (Biodiversity Action Plan) Implementation Programme
- Utilities Framework
- Sustainable Construction Code
- Water Conservation Plan
- archaeological field evaluation report

Approval of details sought for approval under the outline permission as a reserved matters application (RMA) must comply with the approved strategies.

Other permissions

- 2.2 EDC/18/0086 Reserved Matters Application pursuant to Conditions 2 and 18 of planning permission reference no. EDC/17/0048 relating to advanced infrastructure works in the form of land forming and earthworks within the Central and Western villages (excluding Alkerden Farm). Approved 06.03.19

3.0 PUBLICITY AND REPRESENTATIONS

- 3.1 The application was publicised in the Ebbsfleet Development Corporation (EDC) weekly list.
- 3.2 Neighbour notification letters were sent to 259 local addresses. The proposals were advertised on site via 5no. notices and publication in a local newspaper for the following reason:
- Major Development
- 3.3 Site Notice expiry date: 26.06.24
- 3.4 Press Notice expiry date: 27.06.24
- 3.5 At the time of publishing this report no written representations had been received.

4.0 CONSULTATION RESPONSES

- 4.1 The following organisations were consulted on the application and the latest responses, including those from re-consultations on amended/additional information, have been received and summarised below:-
- 4.2 Kent Highways and Transportation:
(25.09.24) No objection with comments as follows:

- **ACCESS:** Junction arrangements comply with LTN 1/20 and is acceptable. The application confirms only the bellmouth, inclusive of the footway and cycleway, will be offered to KCC for adoption. This is acceptable and KCC request to be consulted in future to review any detailed designs/road safety audits as appropriate.
- **TRIP GENERATION:** Original submission sufficiently demonstrated data to represent the health facility. Additional information has been submitted to address questions raised for the calculations for the community centre trip generation. The inclusion of a comprehensive arrival/departure table within the Response document is welcomed and further assists with clarification.
- **PARKING:** The Response document confirms that there will be 43 vehicle parking spaces, plus an ambulance bay.

Having considered the revised development proposals and the effect on the highway network, no objection is raised to this application on behalf of the Local Highway Authority, provided conditions relating to the following are secured in relation to the provision and retention of: Visibility splays; Parking spaces; EV charging infrastructure; 41 secure and sheltered cycle spaces, including 2 accessible cycle spaces; Travel Plan to include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement; Full Parking Management Plan.

Additional Information –

Whilst the site is not to be offered for adoption (excluding the access) there are a number recommendations regarding the layout which the applicant is encouraged to consider:

- The trees either side of the site access should not overhang the cycleway as they could pose a safety risk for cyclists, either through overhead collision or through reducing visibility. The species of tree chosen must be carefully considered to ensure vehicles can see approaching cyclists in both directions prior to crossing the cycleway. It is recommended that trees with narrow trunks are considered.
- It is noted that the parking bay sizes align with those provided within the Alkerden Market Centre Car Park, and adjustment to the parking bay sizes at this stage of the design would lead to a loss of parking bays. However, it is disappointing that the minimum required dimensions have been proposed for this site as vehicles are more likely to overhang minimum dimension sized parking spaces, potentially leading to obstruction of the carriageway/footway within the site.
- The amendments to the vegetation are noted and expected to reduce the risk of overrunning by vehicles parked in adjacent spaces. The Response document states vehicle tracking will be updated as part of a revised TA, though this has not been received.
- The adjustments to the parking bay layout to reduce the conflicts of a reversing ambulance are noted. Likewise it is noted that the delivery bay will have a waiting restriction, increasing the likelihood that this space can be utilised by an ambulance to manoeuvre.
- It is disappointing that a segregated footway is not being provided on the northern part of the site and KCC's preference is for this to be provided. It is strongly recommended that consideration is given to the connections between this, the northern and the western sites as designs for each site progress.
- The provision of level access from the eastern crossing to the front of the building is welcomed. It is strongly recommended that a stepped route in the southwestern corner of the site is provided to increase pedestrian permeability. Though individuals may be able to travel via paths within the adjacent park (though this is dependent on the final designs for the adjacent northern residential parcel), they may not wish to

during periods of inclement weather, hours of darkness, or for personal safety reasons. It is considered that individuals may utilise the healthcare facility as a through route (during business hours) if no other option is available (other than traversing the perimeter the of the building).

- It is recommended that the planting areas either side of the Fastrack route crossings (south of the Hub building) have their corners rounded to reduce the likelihood of vegetation being trampled. Though there are several crossing points in close proximity, pedestrian desire lines typically result in the shortest route being used, with individuals “cutting corners” as a result, potentially trampling low level vegetation.

EDC Officer comment: The above comments so far as they cover KCC’s legislative responsibility are welcomed. It is noted no objection is raised and further discussion and detail is set out in the Highways and Parking section of the report below. Relevant conditions have been drafted in the decision notice above.

In relation to their additional comments:

- *The trees have been amended to a more slender species of Hornbeam tree and a landscape management condition will cover the maintenance of the tree to avoid overhanging the cycleway.*
- *Parking bays are shown at 4.8m x 2.4m rather than the Kent Design Guide recommendation for 5.0m x 2.5m. It is acknowledged the smaller size may give rise to overhanging particularly in the case of larger vehicles. It is noted the same size parking spaces were approved in the first phase of Alkerden Market Centre and these sizes comply with Building Regulations. The applicant advised the larger spaces were explored but would lead to a loss of 5 parking bays which is not desirable. The proposed layout will require more considerate parking in some areas, noting that 4 spaces are enlarged for mobility, and potentially on site management (which will be secured by condition). However, the larger sized bays are negligibly larger than the recommended standards such that the loss of 5 parking bays would cause greater harm to the overall scheme. Amendments have therefore not been sought on this basis.*
- *Further consideration will be given to access safety and legibility to the adjacent sites to the north and west as pre-application discussions progress on both parcels which are outside this red line boundary (which KCC have contributed to). A condition is recommended for hard surfacing materials for the identification of any pathways through the site.*
- *The provision of the access points is the result of discussion with the applicant to ensure footfall activates and enlivens the main entrances rather than diluting with multiple pathways. The provision of a stepped access at this point would cause challenges given the levels and would compromise the cycle parking and plaza.*
- *The Fastrack landscaping has been provided with square corners which is in keeping with the design along the rest of the corridor. More structural planting to these points of concern can be added to address this issue as part of the final soft landscaping detail to be secured by condition.*

4.3 KCC Ecology

(24.06.24) No additional survey information is required to determine the planning application but additional information on the bat and bird boxes to be installed in the site must be provided.

The Ecological letter submitted with the application details a site visit was carried out in February 2024 and at the time of the visit the site was unsuitable for protected/notable species and there are no ecological constraints associated with the proposal. The letter has highlighted that at the time of the survey the site was starting

to revegetate and there was a risk that the site may be used by skylarks. KCC advise that at the end of the breeding bird season the vegetation must be regularly cut to prevent habitat support protected/notable species establishing on site, prior to works commencing, which may affect protected species.

KCC have reviewed the submitted landscaping plans and, as detailed within the Middlemarch letter, are satisfied that the planting within the site will consist of at least 25% native species.

As part of condition 15 for the outline planning permission, there is a requirement for a biodiversity action plan (referred to as a 'mini BAP'). This document details that there is a requirement for each application to implement the following:

- 5 bird boxes per hectare – A range of bird boxes should be installed to benefit as many species as possible. These could include sparrow terrace boxes, swift boxes or bricks, open fronted and hole nest boxes.
- 5 bat boxes per hectare – A range of bat boxes and bricks should be installed on properties around the parcel focusing on those close to green corridors which will be utilised for commuting and foraging.

The letter submitted with the application details that the site area of Alkerden Hub is approximately 1 ha and it is therefore recommended that at least 5 bat and 5 bird boxes are installed. The most appropriate bird box for this section of the development would be integrated swift boxes or bricks such as the Ibstock Swift Eco Habitat – 3 or similar. KCC are unable to find evidence in the landscaping plan or the Design and Access Statement that the bat and bird boxes will be installed. KCC require confirmation that the bird and bat boxes will be installed within the site.

EDC Officer comment: Further discussion is set out under the Ecology section of the report below. A pre-commencement condition is recommended in respect of site clearance to ensure there is no harm to protected species, which the applicant has agreed to. Other conditions have also been included to secure recommended ecological enhancements which the applicant has also agreed to provide.

4.4 KCC Strategic Development & Place Division

(27.07.24) The Programme Manager confirmed the following:

- Community Services (Libraries/Youth/Social Care/Adult Ed) have been engaged in the process and have identified floorspace provision.
- KCC support Alkerden Hub as a location for their services in the future
- KCC will take up floorspace going forward as it is built out and as services require it.
- KCC Infrastructure Team will take forward with KCC Community Services the occupation by these services with EDC

4.5 KCC Lead Local Flood Authority

(10.07.24) No objection

4.6 NHS Kent & Medway Integrated Care Board (ICB)

(04.06.24) Concerns raised regarding building's Overheating Assessment particularly findings within the submitted report noting almost every room fails when assessed against BREEAM criteria when measured against the future projected Design Weather data to review building performance for future weather patterns.

NHS Kent and Medway will continue to work with the applicant and EDC to ensure appropriate actions are taken to help mitigate the impact of higher global temperatures.

Would welcome the opportunity to influence both the building's internal and external layout and design to help ensure the building is able to provide healthcare services into the future. This could include provision of external solar shading, reflective coatings on windows, blind and internal ceiling fans, air conditioning and passive cooling. Installation of a green roof should also be considered to help lower the temperature on the rooftop and strategically placed trees would help provide shade.

Would also be interested to hear if anything further could be done to improve the building's efficiency and make it more comfortable during high temperature periods.

EDC Officer comment: Consultation was undertaken with the ICB on the application given their interest in the site to operate the health space, although no contracts have been agreed in respect of occupation. The ICB has been engaged on the design of the building via EDC's Project Team. The comments received relate primarily to the sustainability of the building which has been examined separately by the EDC's Planning Sustainability Consultant, whose comments are set out below at 4.7.

4.7 EDC Sustainability Consultant – Paul Appleby

(24.06.24) None of the windows benefit from external shading. Do not consider recess depths provides adequate shading from the sun. Proposal features full height windows and occupy 70% of the external wall area on the LLLC. No mention of solar heat gain coefficient (SHGC) planned for the glazing. Area of window extended below desk height provides little benefit for daylighting and limits the usability of external wall area. These issues result in excessive heat gains for the rooms on the south elevation in particular, which can be seen from the results of the submitted Overheating Assessment using the long term temperature profile factoring in global warming. It is noted that a mixed mode approach is proposed that allows occupants to open windows whilst providing a cooling capability when temperatures become unacceptably high. It is also proposed to incorporate a 'night cooling' function which requires automatic motor driven window opening at night. Query raised with effectiveness of a night cooling strategy which is generally associated with exposed soffits, given architectural sections indicating use of false ceilings.

External shading and smaller windows would both reduce the amount of cooling required and the length of time that plant would have to operate, hence reducing associated CO2 emissions. Smaller windows would also reduce heat loss and associated CO2 emissions. For mixed mode to operate successfully each room would require separate control of window and cooling functions – it should not be possible for cooling and natural ventilation to occur simultaneously in a given room. There may be occasions when some rooms require cooling whilst others heating – the roof mounted Variable Refrigerant Volume (VRV) system needs to offer this flexibility.

There appears to be some confusion about the exact area of PV proposed: the Skelly & Couch Zero Carbon report concludes that 100m² is the most feasible option compared with 200m², whilst the HTA plans show a total area of around 270m². It is noted that the area has been limited by keeping the PV panels away from areas designated for greening. However at least twice the area of both PV and green roof could be provided if a 'bio-solar' approach is taken – i.e. PV mounted on the green roofs. In this context it is noted that the incorporation of battery electricity storage is discounted without considering how batteries can extend the period over which the

electricity generated by PVs can be used when no solar energy is available. It would have been useful to see an economic analysis for this.

There does appear to be a lack of ambition with regard to reducing CO2 emissions to anywhere near zero, both in the building design and the services strategy. Further there is no analysis of embodied carbon and any mitigation that is proposed to reduce lifetime carbon/GHG emissions associated with construction and materials, other than a statement of intent.

Other comments:

- It is unclear from the plans what facilities are to be provided for cyclists in respect of changing.
 - Noise Assessment only assesses the potential noise impact of mechanical services plant on neighbouring occupants. Does not appear to be a prediction of likely background noise levels once nearby roads reach maximum capacity and no mention of the potential noise impact from performances in the hall at night.
 - No Air Quality Assessment submitted.
 - Permeable paving should be maximised.
 - Little information is provided on a water conservation strategy, particularly for the health facility which could have a greater demand than other building uses e.g. office.
- *Re-consultation comments (06.10.24)*

Overheating analysis has been provided for two alternative external shading strategies employing horizontal and vertical fins of 600 and 1500mm depth. Although this analysis indicates failure to avoid overheating under CIBSE's future climate scenarios DSY2 and DSY3 for the majority of spaces analysed it appears to be based on the original HTA plans and there is no mention of night cooling. There is no response to the suggestion to remove false ceilings to improve the effectiveness of a night cooling strategy.

Good to see that windows on the south, east and west facades are no longer full height but unsure why this should not apply to the north façade. No revised daylighting analysis has been submitted to justify this.

There has been resistance to external shading. There is no doubt that horizontal fins directly above glazed areas on the south façade would significantly reduce heat gain and hence the duration that cooling would be required and associated carbon emissions. Unfortunately no analysis of this has been forthcoming. However I am glad that a VRV system is proposed that will allow simultaneous heating and cooling in different areas, but it is important that the controls do not allow cooling and window opening in the same room at the same time.

There is no doubt that the reduction in window area and the development of cooling strategy referred to by Skelly & Couch will have an important impact on carbon emissions, although I remain convinced that 600-800mm deep horizontal shading directly above windows in the south facing elevation would have a significant impact on both carbon emissions and the environmental quality of the south facing rooms.

It is difficult to tell from the resubmission documentation what the revised areas of PV and green roof are. The HTA plans for the 2nd floor and roof show two different layouts over the health centre. There is no explanation as to why my recommendation to combine PVs and green roof into a 'biosolar' roof has not been considered. This would significantly increase the areas of both and, particularly when

combined with battery storage, reduce operational carbon emissions, and enhance the ecological value of this site, which currently has very little soft landscaping.

With regard to whole life and embodied carbon predictions it is recognised that these are difficult to estimate for a shell & core design since they will be impacted by fit-out. The figures quoted in Twin & Earth's undated Sustainability Matrix predict an Energy Use Intensity of 49.44 kWh/m²/yr and whole life carbon of 1106 kgCO₂eq/m²/yr. However these figures are meaningless without comparison against established targets such as those produced by LETI and UKGBC. With regard to embodied carbon specifically it is more important to understand what measures are being taken to reduce whole life emissions, such as through material choice, low carbon cement and modern methods of construction/offsite prefabrication etc.

The resubmitted scheme is a definite improvement with respect to its carbon performance on the previous submission. The absence of response on the architectural implications of recommendations made is disappointing. Clearly the elevations would change markedly if external shading were incorporated but its exclusion is as much an architectural decision as carbon-related and I would like to have seen justification from HTA as well as Skelly & Couch. I can see no reason, apart from economic perhaps, why biosolar roofs have not been considered, along with batteries.

Other comments:

- Changing facilities and showers in the health centre are welcomed. Similar facilities for the LLLC do not appear to be proposed.
- Noise, air quality, landscape/drainage and water consumption comments have not been responded to.

***EDC Officer comment:** The provision of solar shading has been raised with the applicant but has not been delivered in the fabric of the building which is disappointing. Further consideration in respect of opportunities to improve the use of the roof for sustainability, including the extent of coverage by PV panels and green roof is considered to be an opportunity for detailed design and is therefore included in condition 10 above. Further discussion on sustainability including solar shading, PV and biosolar roofs is set out in the Sustainability section of the report below. Further details in respect of the VRV (Variable Refrigerant Volume) system referenced by the consultant (also known as the generic term 'VRF' (Variable Refrigerant Flow)) will be conditioned to ensure they accord with the objectives of the submitted reports.*

In relation to the reduction in window size, it is considered that since the windows on the north elevation would not receive direct sunlight by reason of their orientation, a revised daylighting analysis is not required and has not been requested. The predicted figures for whole life and embodied carbon have been compared against the EDC's draft Ebbsfleet Sustainability Assessment. EUI of less than 55kWh/m²/y is the LETI target and therefore identified as the Net-zero best practice. This is supported in accordance with the shell and core assessment, while further implications of carbon and energy efficiencies are examined further in the Sustainability section of the report below.

Comments made in respect of drainage/permeable paving and noise are covered by other specialist and statutory consultees, as listed above/below and are discussed in the report as required. The applicant has confirmed there are currently no shower facilities in the LLLC for cyclists however, they agree to provision of a condition for this to be explored. Air quality has been addressed under the OPP.

4.8 EDC Landscape Consultant – CSA

(19.09.24) Updated submission documents have been reviewed and noted amendments including: the provision of a footpath at the eastern vehicular entrance, updates to tree girths along the Fastrack corridor and amendment to proposed paving arrangements to the south of the building to reduce the extent of colour change. These amendments are welcomed. Also noted that seating is now shown in the small communal area at the western end of the building which is a welcome addition.

Within the car parking area, welcome the addition of root barriers to those planting areas that are smaller and contained proposed trees. However, we note that the car parking spaces have not been broken up with planting areas as per our previous comments. Generally they should be broken up every 4-5 spaces to reduce the dominance of cars. There are still several runs of about 8-9 spaces without a break, including at the western end of the car park, with no allowance for planting to soften the future phase of development to the west.

The revised 2nd floor plans are still showing an outdoor amenity area on the roof as well as areas for green roof, which is welcomed, but some details of what these areas will comprise in terms of hard and soft landscape materials, and street furniture is required.

EDC Officer comment: The desirability for additional trees to break up the dominance of cars is noted. It is also acknowledged provision of additional planting would be likely to lead to a loss of car parking spaces which would be less desirable based on the identified demand in the submitted Transport Assessment. Further detail on this is provided in the Highways and Landscape sections of the appraisal below. Further details required in relation to the green roof, outdoor amenity area to the 2nd floor amenity area, hard/soft landscaping and street furniture will all be conditioned.

4.9 EDC Noise Consultant – Bureau Veritas

(11.06.24) Agree with the policies and adopted assessment methodology, noise survey and plant noise assessment as set out in the submitted noise assessment report. Satisfied that noise from building services plant located on the roof of the proposed Civic Hub building can be controlled so as not to result in unacceptable impacts at future nearby residential buildings (once built and occupied). However, it must be demonstrated that the design and implemented sound attenuation measures ensure that the Rating noise level (including required acoustic character corrections, if applicable) achieve the proposed noise limits (not exceeding the typical representative background sound level).

Approval, if given, should therefore be conditioned on provision of a further assessment demonstrating compliance with the limits, with validation testing once the plant is installed and operational.

EDC Officer comment: Further discussion is set out in the Amenity section of the report below. A condition is recommended to ensure the development operates within acceptable noise limits to avoid harm to neighbouring amenity.

4.10 Kent Police – Design Out Crime Officer*

(03.06.24) No objection but several comments and recommendations:

Layout & Design –

- Should be natural surveillance to parking areas. CCTV should be installed for further monitoring – advice provided on where these should be located. Recommend gating access roads. Parking areas to prevent nuisance parking and misuse out of hours.
- Defined pedestrian routes to/from the building recommended to avoid conflict with vehicles. Creation of desire lines should be discouraged
- Lighting needs to be assessed by a professional engineer, provide safe access to the building for safety and should confirm to minimum standards
- Alarm system and access control should be installed
- External doors, windows, curtain walling and any shutters to meet the necessary certified standards
- Bin stores to be secured and lit
- Maintenance roof access to be securely locked
- Consideration of tree species so as not to impede surveillance or effectiveness of lighting and hedges should be no higher than 1m.
- The entire health facility must be enclosed in order to control access by pedestrians.
- There should be no structures or physical features that compromise the security of the perimeter.
- Vulnerability of computers and office equipment to be considered, as well as personal attack alarm at receptions

EDC Officer comment: It is considered the layout of the building provides natural surveillance over the parking area from the windows on the north elevation. While CCTV may be of benefit, it cannot be assumed that it will be necessary. CCTV has not generally been secured for other car parks within EQ and there will be a level of natural surveillance and movement through the site, particularly given the access requirements to the adjacent parcels as part of future developments. It is therefore considered that should provision be required in the future, this will be covered by permitted development rights (which have not been removed by the OPP). Gated access is not supported given the public use of the site and the likely provision through the site to provide access to parcels 4A and 4B immediately to the north and west of the Hub.

Limited information has been submitted with regards to lighting and this will need further details to be submitted by condition. This is discussed further in the appraisal below. Shutters are not proposed and are not supported from a design perspective and the perception from the street of community integration. Bin stores are integrated within the building. Trees proposed in the rear car park would not obstruct visibility from the upper floor windows; natural surveillance would be maintained. Some shrub planting is proposed at a height of 1/1.5m which may slightly exceed the recommended height for hedges but these would not be planted so as to form a solid hedgerow. The proposed layout provides door access between the health facility and LLLC which provides opportunities for security as well as interconnectivity to integrate services. No structures are proposed around the perimeter that would be considered to compromise the security of the building.

Remaining comments in respect of alarm systems, access controls, external doors/window/shutter/curtain walling standards, roof access, internal fittings and equipment of the health facility fall beyond the planning remit and issues should be discussed with the Operator. The applicant has been made aware of the comments for their own consideration of these matters and liaison with future Operator(s).

**N.B. Engagement was also undertaken with the Lee Cheesman, Dartford Community Safety Unit at Kent Police who has been engaged in discussions regarding the police space to be provided within the Hub who confirmed the space meets requirements with the intended use for local officers and PCSO's to use the*

office space as a reporting hub to carry out daily admin as opposed to needing to travel to a local station, which keeps them visible in the community. The police accommodation is discussed further in the appraisal below.

4.11 Southern Water

(24.06.24) The sewers services at this location are the responsibility of Independent Water Networks Ltd. There is an inset agreement/NAV agreement in place between Southern Water and IWNL for the supply of sewerage services. The connection/discharge points to the public network and agreed discharge flow rates must be complied with inset/NAV (New Appointments and Variations) agreements terms.

4.12 Health & Safety Executive – Planning Gateway One

(04.06.24) From the information you have provided for this planning application, it does not appear to fall under the remit of planning gateway one because the height condition and use of a relevant building is not met.

4.13 Kent Fire & Rescue Service

(12.07.24) It appears the emergency access requirements under the act [*County of Kent Act 1981 Section 53*] have been met.

Applicants should be aware that in the event of planning permission being granted the Fire and Rescue Service would require emergency access, as required under the Building Regulations 2010, to be established.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

4.14 Swanscombe & Greenhithe Town Council

(13.06.24) No observations

4.15 The following organisations were consulted on the application but provided no comments: -

- Thames Water
- Cllrs Victoria Akintomide-Akinwamide, Jonathon S Hawkes and Danny Nicklen

5.0 **PLANNING POLICY**

5.1 National Policy & Guidance

National Planning Policy Framework (December 2023) ('NPPF')
Planning Practice Guidance ('NPPG')
National Design Guide
Building for a Healthy Life 2020

5.2 Development Plan

The Dartford Plan to 2037 (2024):

- S1 - Borough Spatial Strategy
- S2 - Infrastructure Planning Strategy

- S3 - Climate Change Strategy
- S4 - Borough Development Levels
- E1 - Ebbsfleet and Swanscombe Strategy
- E2 - Ebbsfleet Garden City Development Principles
- E5 - Alkerden and Ashmere Allocation
- M1 - Good Design in Dartford
- M2 - Environmental and Amenity Protection
- M3 - Sustainable Technology, Construction and Performance
- M14 - Biodiversity and Landscape
- M15 - Travel Management
- M16 - Active Travel, Access and Parking
- M17 - Community Uses

5.3 Other Guidance

Ebbsfleet Implementation Framework 2017
 Design for Ebbsfleet Guide
 Ebbsfleet Public Realm Strategy
 Ebbsfleet Sustainable Travel Strategy
 EDC Sustainable Performance Framework

6.0 PLANNING APPRAISAL

- 6.1 The main issues to be considered in connection with this proposal are the principle of development, each of the Reserved Matters (access, appearance, landscaping, layout and scale), sustainability, highways and parking, amenity and ecology. Intrinsic to the assessment of these issues is whether the proposal complies with the obligations as set out in the outline planning permission, local and national policy and the overarching aims of the suite of documents secured under the outline permission, notably the Area Master Plan and Design Code (AMP/DC).

Principle of Development & Outline Planning Permission Obligations

- 6.2 The NPPF identifies achieving sustainable development through three overarching objectives, including a social objective supporting delivery of strong, vibrant and healthy communities by fostering well-designed, beautiful and safe places, with accessible services that reflect current and future needs and supports communities' health, social and cultural well-being (paragraph 8). It sets out that decisions should aim to aim to achieve healthy, inclusive and safe places and beautiful buildings which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs and identifies the importance of social interaction, for example through mixed-use developments (paragraph 96). It supports the provision of social, recreational and cultural facilities to service the community needs, requiring planning decisions to plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (paragraph 97).
- 6.3 Policies S1 and S2 of the Dartford Plan identify key development sites in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods which are resilient and adaptive to climate change and deliver community uses including education, health, sports facilities and cultural services. Policy E1 identifies the delivery of a 21st century garden city at Ebbsfleet,

achieved through the co-ordinated delivery of well-designed, well-served mixed neighbourhoods which will include health facilities. Policy E2 identifies garden city development principles which include the provision of accessible and attractive new District Centres and community and public facilities in walkable, vibrant, sociable neighbourhoods, while policy E5 expands on these principles, supporting the principle for delivery of mixed residential neighbourhoods supported by provision of centres with community facilities and local services, identifying Alkerden as a significant local hub for Ebbsfleet garden city with a District Centre which will include an education campus and medical/ healthcare provision. Policy M17 focuses on community uses and states new community facilities will be supported where they are in an appropriate location and of a type, scale and design to reflect the needs of the existing and emerging communities they will serve. Delivery Theme 5 of the Implementation on 'Civic Community' seeks to optimise the quality of life for local people through the provision of accessible social infrastructure, cultural, community, education, recreational, and local shopping facilities, within healthy, well-connected neighbourhoods which are open and accessible to everyone.

6.4 Outline planning permission (OPP) has already been secured for the whole of EQ. The OPP secured certain obligations for the Site Owner to deliver several community facilities. The application seeks to deliver compatible facilities together by combining them within a single building. This principle of co-location is welcomed as best practice, providing a spatial focus within the development site, generating greater activity and footfall and better opportunities for flexibility of spaces as demands evolve, and is supported by paragraph 96 of the NPPF.

6.5 The obligations in the OPP are as follows:

Facility	Size required by OPP
Health Facility + Ambulance hardstanding	To accommodate 8 GPs (or alternative health care provision) + 170m ² for social care
Lifelong Learning Centre ('LLLLC') to include: - Information centre - Adult Education Services - Adult Social Services (non-clinical) - Youth Services - Library Services	1,415m ²
Community Police Accommodation	Up to 50m ²
Job Centre	30m ²
Religious Facility	Maximum in total 0.4ha

Table 1: OPP requirements

6.6 Relevant triggers and required level of finish/specification to be provided by the Site Owner are also identified for each of the facilities under the OPP. The triggers ensure the appropriate phased delivery rate in accordance with agreed masterplanning to provide a flow and complementary range of development, facilities and infrastructure, as required by Policy S4 of the Dartford Plan.

6.7 There are no specified floor areas under the OPP for the health facility (with the exception of the associated social care provision). Consequently the requisite floor area has been identified in collaboration with the Kent and Medway ICB and layouts refined during pre-application discussions to suit their requirements. The proposed

floor layout identifies 17 consultation rooms and extensive ancillary spaces including nurses office, reception/waiting areas, private weight and measurement rooms, staff space, WCs and changing rooms, which would be in excess of a standardised 8GP facility. The provision is therefore considered to meet the requirements of the OPP. The additional 170m² of social care space has been provided separately within the building on the ground and first floor, located alongside other spaces to be operated by KCC, which meets the requirement and is welcomed in the interests of integration.

- 6.8 Since the OPP was originally secured in 2007, delivery of services and best practice has moved on. This has been identified through engagement with the local community, KCC and the proposed operator, EGCT, who has reached out to several local groups. KCC in particular has identified that the amount of space allocated to services under the OPP is no longer reflective of the way these services are now delivered and spatial requirements are smaller overall due to a desire to integrate services. It is also identified in Policy M17 of the Dartford Plan which states that wherever possible, new facilities must be provided and designed in a way that allows flexible operation by a variety of users. Delivery of the overall floorspace as required by the OPP and how this might be applied in a flexible way has therefore been discussed with EDC officers as part of the pre-application engagement. As such, the proposal seeks to deliver an enhanced scheme that provides a more bespoke range of uses in addition to the s106 requirements, while maintaining the delivery of the overall obligated floorspace. Within the footprint of the building, therefore, complementary additional uses have been included following a period of engagement with prospective end users to reflect the needs of the local community and consequently some uses have been reimaged.
- 6.9 It is acknowledged that at the time of this report the full and precise details of the operation of each service within the Hub is not fully known and engagement is still being undertaken with prospective users on their emerging service models. However, information has been provided in the application to demonstrate how the delivery of services is intended to work.
- 6.10 The application identifies that the Hub design is largely focussed on co-location, which gives the building operator the ability to change and adapt and provide an integrated solution to users such as KCC, who will be one of the primary users and who are moving towards a more integrated approach to providing services than that previously envisaged by the s106. For example, rather than provide standalone early years services identified in the LLLC, this provision has now been replaced by the concept of a 'Family Hub', which is described as a flexible space accessible to Parents/Carers and their children aged 0-19 years old, and up to 25 years old if they have special educational needs and disabilities. It can also be accessed by parents-to-be. Services could include early years education; training or finding a new job; antenatal classes; healthy child clinics; support with breastfeeding; support with parenting and speech and language; drop-in sessions for parents and children; services for children with special needs and disabilities; opportunities for families to get involved with volunteering and designing services. To allow for maximum flexibility, spaces utilised by KCC to run the required services will also be open to the public outside their regular operating hours. While the plans indicate a creche room, this is not intended to operate as an independent nursery but rather integrated with the Family Hub and utilised while Parents/Carers utilise other services provided within the building.
- 6.11 On the 3rd floor, an open plan co-working space has been designed to meet the needs of the growing small business owners looking to co-locate and network with similar businesses as well as provide hot-desking opportunities for statutory services within

the Hub and from surrounding areas. These could also be rented by any other users of the building requiring additional desk space.

- 6.12 An allocation of 50m² for Police accommodation has been provided on the 2nd floor in the form of 5 individual rooms measuring c.10m² each. The s106 requirement for the space is intended 'wholly for use for the provision of community police services' within Alkerden Market Centre and the Alkerden AMP identifies it as a 'drop-in' facility. It is acknowledged provision on the upper floor would challenge the principle of a drop-in facility to serve the public. However, the space has been designed in collaboration with Kent Police to suit their needs. Feedback on the planning application identifies it is fit for their needs, intended to be office space to accommodate computer equipment for local officers and PCSO's to use as a reporting hub to carry out daily admin as opposed to needing to travel to a local station which therefore keeps them visible in the community. It is understood the space will be for sole use by the Police. Given the acceptability of the intended user and compliance with the s106 requirements, the provision is considered to comply with obligations.
- 6.13 The LLLC is also enhanced through the provision of sociable spaces such as a café, centralised library space with associated breakout area. The total area required by the OPP (excluding health provision and religious facility) is 1,665m². The proposal would provide slightly over this at 1,795.7m² and would therefore meet the requirements of the OPP.
- 6.14 The proposal includes a ground floor hall space measuring 223.44m² – or seating capacity for 200 seats – with additional associated space provided for storage, a 'Green' room and 2 x ablutions rooms. Further space is also provided on the first floor in a 'studio' space to operate in conjunction with the hall, which can be subdivided into two. Storage area is also provided to serve the studios. It is intended the hall and studios will provide a worship space for multiple faith groups. The hall can also be hired as a private hire event space for conferences/funerals/exercise classes or a performance space for local art groups or schools. A servery is also provided to serve the hall to facilitate social events. The total area of space allocated to the religious facility has been calculated at 397.2m². While this falls well below the maximum space of 0.4ha identified in the OPP for religious space, this is an 'up to' figure. The space proposed has been calculated based on identified demand through engagement with local religious groups. Should further demand be identified in the future and a proposal put forward for additional religious space elsewhere in EQ, there would be capacity in accordance with the quantum secured under the OPP to support the principle of further delivery. The principle of provision of a multi-faith space is supported and the requirements of the OPP are considered to have been met. It is also noted the OPP imposed a condition (58) limiting the size of a theatre to 200 seats to prevent any detrimental impact on existing neighbouring town centre theatres and therefore the viability of those town centres. While performances may be facilitated within the space, the hall has not been designed as a theatre *per se* and the capacity falls within the required parameters. A further OPP condition (33) requires a single unit for commercial leisure use (falling within Use Class D2 – now Use Class E/F.2/Sui Generis) over 3,000m² would require provision of a Leisure Impact Assessment to include the impact upon town centres and the impact of traffic arising from the use. The proposal for the leisure elements of the Hub falls well below the required threshold and as such no LIA has been provided nor pursued in connection with the application. The application is therefore compliant with the OPP in these respects.
- 6.15 Notwithstanding the uncertainties regarding the exact operation of the spaces, it has been demonstrated the proposal would provide the obligated space to facilitate

provision of health, community and leisure services in accordance with the OPP, albeit in a reimagined model. It is therefore concluded that the proposal meets obligations as set out in the OPP and accompanying s106. It is also noted the EDC's Space in the Plan review, which identified need of community spaces for residents in Ebbsfleet in respect of location and scale, identified opportunity for provision of a 'Scale D – Landmark Facility' to act as a visual and spatial focus for Ebbsfleet with a floor area of between c2500m² to over 4000m². Notwithstanding the floor area will also provide statutory health services the overall scale of the proposed Hub at 3808.8m² GEA aligns with the aspirations for a building of this scale at this location.

- 6.16 The co-location of services will create a dynamic and exciting facility which provides the spaces required by the OPP but with greater opportunity for integrating other uses and creating flexibility to meet the demands of the community, in accordance with national and local policies, which is supported. Necessary planning conditions are suggested to control the use of the building to ensure delivery of a health facility together with flexibility around the community and other ancillary uses, allowing it to evolve and respond to fluctuating demand, while maintaining operation for those broad uses as intended under the OPP. The OPP allows for the health facility to comprise an 8GP space 'or equivalent alternative health provision - to be agreed with the local planning authority', which reflects the change in approach to accessing primary healthcare and an increased focus on promoting healthier lifestyles, building in health and wellbeing into the built environment. While engagement is being undertaken with the ICB regarding services that might be facilitated within the Hub, it is considered appropriate conditions should continue to reflect the focus on 'health' rather than limiting solely to GP surgery provision. It is also proposed to secure a Community Management Plan. An initial framework has been provided with the application which sets out principles for operation. However, a final version is recommended when end users are known.

- *Masterplanning principles*

- 6.17 Provisions secured under the OPP are drawn down through a suite of documents approved by condition which form a comprehensive strategy and set of objectives for the delivery of housing and associated infrastructure. A combined Area Masterplan and Design Code (AMP) for Alkerden have been approved which set out spatial principles to deliver the requirements of the OPP. The OPP specifies that RMAs should generally accord with the AMP unless robust justification is provided.
- 6.18 The AMP for this area identifies the application site for mixed use, to include the Community Police Accommodation and Religious Facility, which the proposal adheres to. In association with the proposed movement network, the site is identified to provide a centralised parking area. This is discussed in further detail later in the report but public parking is provided to the rear of the building.
- 6.19 The AMP/DC refers to provision of a Community Hub within the village which will comprise a vibrant mix of uses and contain a Lifelong Learning Centre. The application site is located within an area identified within the AMP as the 'Market Centre' which is described as the centrepiece to Alkerden and the wider development area which will be a vibrant hive of activity. The location of the application site for the proposed delivery of a Community Hub complies with the vision for the village and is in principle considered to accord with the requirements of the AMP.

Reserved Matters – Access and Layout

- 6.20 Matters relating to access include consideration of the accessibility to and within the site for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network. Consideration of layout includes buildings, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development
- 6.21 The NPPF sets out that applications for development should ensure safe and suitable access to the site for all users and that the design of streets, parking areas and other transport elements reflects current national guidance (paragraph 114). It encourages sustainable travel and supports opportunities to promote walking, cycling and public transport use (paragraph 108) together with the creation of places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.
- 6.22 The provision of a successful layout is intrinsic to good design which is at the heart of Policy M1 of the Dartford Plan which facilitates ‘a sense of sense of place with social interaction, a physical environment encouraging health and wellbeing, attractive active environments and travel options, and secure, inclusive and integrated neighbourhoods through a mix of uses and careful design and layout that ensures that commercial and public facilities are well integrated within the site and the wider locality’. The policy also supports permeability for the site to ‘sufficiently connect to its surrounds and for the public to traverse the site, through clear pedestrian and cycle linkages and, where appropriate, active frontages, open streets, and a fine grain mix of buildings and spaces’.
- 6.23 The Ebbsfleet Implementation Framework Delivery Theme 3 (Connected People and Places) promotes legible networks and the creation of safe, integrated and accessible transport systems, with walking, cycling and public transport systems designed to be the most attractive form of local transport
- 6.24 Broad locations and principles for connections and road corridors within EQ were established under the OPP, particularly in the Transport Strategy and the Site-wide Masterplan. Further detail on the movement network has been set out in the AMP which establishes appropriate street typologies. The AMP further sets out that development in the Market Centre character area should provide a connected welcoming heart with space to enjoy, dwell and move through. There should be a strong positive relationship between the built form and public realm to enhance attractiveness and vibrancy. Blocks should be broadly characterised by edges and centralised car parking areas within the core of the block, not visible from the public realm.
- 6.25 The application site is in a highly sustainable location on the junction of a primary street and Fastrack corridor, both of which provides segregated pedestrian and cycle routes which promotes access routes for active travel. Both of these streets have been granted detailed planning permission so access and layout of the proposal have therefore largely been determined by the location of the consented access road and the fixed location of Fastrack through the heart of Alkerden.
- 6.26 The site is laid out in a single east-west orientated block with the principal elevation fronting the Fastrack corridor, as required by the Alkerden AMP. A parking area is located to the north of the building as surface parking with some landscaping. In this respect the proposal is compliant with the AMP which states that development blocks should be broadly characterised by development at edges and centralised car parking

areas within the core of the block that is not visible from the public realm in order for the public realm to be as welcoming as it can be.



Figure 2: Site layout

- 6.27 A single point of access for vehicles into the proposed car parking area is proposed from the primary north-south street immediately to the east. The junction was designed and approved as part of the approved RMA for Parcel 5B to the north of the site which also included the north-south Primary Street (EDC/21/0114) and is to be retained in this form with a minor amendment moving the junction slightly northwards to accommodate the proposed development design and incorporating a set back pedestrian/cycle crossing to have priority over vehicles. This is noted by Kent Highways who acknowledge the intention for the junction to be adopted and raise no objection. Two access points are provided into the building from the rear for those arriving by car or making deliveries. Access is also provided to the two integrated refuse storage areas to the rear of the building, away from the main street. Refuse vehicles will be expected to access the site from the primary street.
- 6.28 Legible access is provided around the perimeter of the site. The principal access into the building, as reflected through the architectural detailing as the main arrival space, is provided along the south elevation, orientating the building towards prioritisation for pedestrians and cyclists, creating a welcoming arrival experience. Cyclists utilising the dedicated cycle route to the west or south of the building are provided with crossing points to connect into a hard surfaced area along the front of building, which provides access to covered cycle stands to be provided in a prominent position at the front, south-east corner of the building at the street edge. Stepped and ramped accesses are provided to the main front doors. Multiple entrances are provided along the principal elevation providing direct access to different planned services within the building.
- 6.29 With regards to the internal layout, the building has been divided into 3 distinct areas: health facility to the west (2 floors), hall/studios in the centre (2 floors) and LLLC to the east (4 floors), with complementary uses carefully considered and located next to each other. The design of the health facility layout over 2 floors was a preference expressed by the ICB. Internal doors have been maintained at both first and second floor levels to provide connectivity. While the benefits of fully integrated services are recognised in the interests of best practice, increased flexibility and opportunities to fully integrate services across the building, so too sensitive matters in relation to personal health when patients are in discomfort/distress, hygiene/medical cleanliness standards and

security of medical equipment are also recognised as challenges to fully integrated environments. It is also recognised that the ICB requested some separation and this was also reflected in comments from the Kent Police DOCO.

- 6.30 The layout design of the main staircase to promote its use as the primary means of access for able bodied individuals was raised as a concern from EDC officers with a preference to provide an open atrium to better integrate spaces and provide visual connectivity to improve internal articulation and make the staircase the preferable option for individuals who are able to use it. The applicant responded stating requirements to provide an enclosed staircase to deliver safe escape routes in the event of a fire but that glass panels and a skylight will be provided to allow some visual connection with internal spaces and natural daylight with the intention that the internal finishes will create a bright and welcoming space. While this would not be the preferred solution, the requirement for fire compliant circulation spaces is acknowledged. There is also some concern there is insufficient storage for groups and activities within the main hall. No clarification has been provided as to how storage has been calculated. While additional storage would be considered desirable, it is noted that amended plans identify reconfiguration of the internal space which now accommodates a single large store of 12.22m² which would be more practical for the storage of larger items such as tables and chairs for larger gatherings, which is the intended use of the Hall. Further storage provision has been made on the upper floors including on the second floor adjacent to the Family Hub, which is intended for use for buggies.
- 6.31 While discussions with future occupants of the spaces is still ongoing, the internal layout has been designed to accommodate an effective and practical layout as best as possible based on information known at this time. It is acknowledged that as the exact nature of services to be provided is understood, some changes may be required. However, the internal layout and overall structure of the building has been designed such that it would allow for internal divisions to be changed if necessary, which would not affect the overall building envelope or the external appearance. Any changes would be secured through subsequent permissions, as required.
- 6.32 In respect of external spaces, the building has been laid out to facilitate an outdoor terrace on the second floor which has been detailed in the application as being accessible to anyone or any group using the building, subject to safeguarding and access arrangements. In practice, unless previously booked by a group or activity, it is anticipated that this will largely be those in the second (adult learning) or third (co-working space) floor, as this offers a breakout close by without having to go back to the ground floor. The terrace will also provide a quiet place of reflection for the staff of the Trust and other service providers.
- *Accessibility*
- 6.33 Policy M1 of the Dartford Plan states public spaces in and outside buildings must be designed to be inclusive including for young, elderly and less mobile people. Level, step-free access is provided from the car park (including from enlarged accessible car parking spaces) into the building at the rear and from the public realm to the front doors on the principal Fastrack elevation.
- 6.34 Level changes across the site have largely been absorbed within the internal layout. This has resulted in the ground floor level of the health facility being at an elevated level from the street. However, it is considered this assists with challenges that had been identified in providing privacy to the consultation rooms from potential direct

overlooking from the street. Some change in level is still present, which is discussed in the following paragraph.

- 6.35 An access statement has been provided by the applicant, carried out by a separate contractor, which covers travel to the site, parking provision, access routes around the building and internal circulation and access. The report concludes that the proposals at this stage demonstrate a good level of inclusive design will be achieved by the finished scheme. A passenger lift and passenger evacuation lift is detailed in both the health facility and LLLC (a passenger evacuation lift being generally utilised as a normal passenger lift until required by fire and rescue). The second lift in the LLLC will also be required to serve the split-level ground floor which occurs between the middle and eastern portions of the Hub and is less than 1m difference. It is unfortunate the ground floor is not level throughout for the purposes of accessibility but the challenges of the sloping site are recognised and the least intrusive means of accommodating are considered to have been implemented. Options were discussed with the applicant at pre-application including provision of a ramp but this would have required a reasonable take up of space which is already working hard to accommodate serve multiple purposes. A stair core is also provided within each of the western, central and eastern portions of the building which somewhat ease demand on some lift usage.
- 6.36 At the time of the original assessment, it was flagged the submitted access statement was limited inasmuch as it referred only to Building Regulations. A subsequent assessment has been provided which evaluates the scheme against the London Legacy Development Corporation Inclusive Design Standards (which is identified as a recommended standard in accordance with EDC's Public Buildings Design Standards) (an internal assessment tool which moderates proposals for community buildings against a set of design criteria incorporating EDC strategies and other best practice checklists) which demonstrates the spaces have been designed to deliver a fully inclusive environment. In relation to specific points raised by EDC officers, the applicant has confirmed the lift sizes comply with the LLDC standards for 3 of the 4 lifts which allows for one wheelchair user and several other accompanying passengers as well as allowing wheelchair users and individuals with walking aids to turn 180 degrees. The 4th lift has been designed in accordance with IBC requirements to accommodate a stretcher and is therefore slightly larger (at 1100mm x 2100mm rather than 1100mm x 2000mm)
- 6.37 Internal assessments have been undertaken for Inclusive Design (which benchmarks the scheme against the London Legacy Development Corporation's Inclusive Design Standards for Public Buildings) and Design for Dementia (utilising the University of Stirling's Environments for Ageing and Dementia Design Assessment Tool (EADDAT)). With the exception of the provision of an open staircase as discussed above, the proposal aligns with the principles in both assessments. Consideration of accessibility has clearly been factored into the layout of the building and is well designed and compliant with policy.

Reserved Matters – Scale and Appearance

- 6.38 Consideration of scale relates to the height, width and length of each building proposed within the development in relation to its surroundings. Matters of appearance refer to a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour, and texture.
- 6.39 The NPPF states that the creation of high-quality, beautiful and sustainable buildings is fundamental to what the planning and development process should achieve and that

good design is a key aspect of sustainable development (paragraph 131). Paragraph 135 requires developments to function well and add to the overall quality of the area for the lifetime of the development, are visually attractive as a result of good architecture, sympathetic to local character including the surrounding built environment and landscape setting and establish a strong sense of place, using building types and materials to create attractive, welcoming and distinctive places to live, work and visit. Development that is not well designed should be refused and significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes (paragraph 139).

- 6.40 Policy M1 of the Dartford Plan sets out principles for good design, requiring development to respond to positive aspects of the locality and creation of appropriately distinctive high quality and beautiful places, demonstrating its suitability in terms of height, mass, form, scale, articulation, detailing and roof form, and using materials that support a sense of place and relate well to the local character. Policy E2 sets out that proposals in Ebbsfleet garden city should be designed to be of the highest quality, including beautifully and imaginatively designed buildings which combine the best of town and country and exemplar developments and should comply with the principles set out in the Design for Ebbsfleet Guide.
- 6.41 The AMP identifies design parameters for this site as being high-density mixed-use development of at least three storeys. Since no residential use is proposed, the density is not considered to apply in this instance. The height of the Hub ranges over the length of the building. The western and central portions of the building are two storeys but have been designed with increased floor to ceiling heights to respond to site levels, provide appropriate internal scales and provide a building with substantial external form. Notwithstanding the ground levels, the height from internal ground level to top of the health centre parapet is 10.85m. The central portion of the Hub features a taller parapet feature to enhance the central access point into the building, emphasise the civic role of the community hall located within it and create variety along the roof form. The increased height is considered equivalent to 3 storeys and therefore compliant with the AMP. The building rises to the eastern portion of the building at 4 storeys over 17.8m, creating a key Fastrack corner, as identified in the AMP Placemaking Plan, and responding to the vast scale of the secondary school on the opposite corner.
- 6.42 The site sits within the Market Centre character area as identified in the AMP, which should feature high-quality buildings characterised by taller building forms and bulkier than elsewhere in Alkerden to emphasise the hierarchical importance of the Market Centre and capitalise on the centrality of the location and its proximity to public transport/good walking and cycling links. While some high-level guidance is suggested on materials and detailing, no specific architectural style is identified. Buildings should 'develop a specific building design narrative...that displays an individual style' to create the vibrancy and diversity envisioned for the commercial and community uses to be delivered in the Market Centre. The AMP therefore allows flexibility for developments to come forward with their own architectural response.
- 6.43 Architectural analysis has been undertaken to survey the character and details of buildings within the surrounding neighbourhood and further beyond within North Kent together with an historical analysis of the site. Consideration has also been given to the Design for Ebbsfleet guide identifying the site within the scarp narrative area which includes principles to express verticality of mass, a more 'refined' expression of the industrial modelled aesthetic materiality including red brick buildings with contrasting white/lighter coloured brick/masonry frames to emphasise verticality, large areas of glazing capturing views, an articulated silhouette and skyline.

6.44 The application sets out that inspiration has been drawn from both the industrial heritage and resulting dramatic landscapes that is embodied within Ebbsfleet's development sites creates a unique feature. Research has been undertaken into the cement works of the area, analysing forms, elevation composition and materiality. Factories associated with the industry are identified as large singular volumes whose form followed function, displaying strong verticality, undulating forms and simple, gridded buildings and structures. This industrial heritage relates to the wider activity particularly along the river in Ebbsfleet as well as the chalk component which relates to the historic quarrying within EQ. The dramatic white cliffs created from the legacy of chalk excavation and located around the perimeter of the EQ site and the chalk spine located immediately to the west of the site in the Major Urban Parking open space have also inspired the design. The proposed narrative fits well with a singular building of this scale and is specific to the site to help create an individual style.



Figure 3: South Elevation



Figure 4: North Elevation

6.45 While internal layout has been separated into clearly defined areas, the overall look and feel of the Hub is expressed as a singular building achieved through adopting a simple but cohesive material palette and suite of architectural components and details. The building displays a simple orthogonal form which varies in its height and scale but shares a commonality in massing and articulation across all facades.

6.46 The scale and massing of the hub building builds from west to east, reaching its pinnacle on the eastern corner where it is articulated as a four storey 'landmark tower', that holds the corner at the main street intersection. This landmark status is further enhanced through the projecting of the vertical piers of the building grid up through the eaves line to form a distinctive silhouette within the village. The changes in roof line along the Fastrack corridor create a dynamic roof line that contribute to the building's visual interest and help significantly in establishing character and distinctiveness for the wider scheme.

6.47 In relation to architectural detailing, EDC's Head of Design supports the proposal:

"The façade composition successfully balances order and complexity, using the grid as a visual device to establish a unifying order across the scheme. The verticality of

the grid is expressed in different ways along the Fastrack boulevard, allowing the scheme to denote different sections of the building, while always working within an overarching design language that ensure the scheme reads as one.

The highlight is undoubtedly the corner tower, which has interpreted the grid with a vertical emphasis, incorporating elegant proportions that give the tower a lightness in form that contrasts well with the more solid massing of the school building opposite.”

- 6.48 In contrast to the level of detail on the south and eastern elevations, it is acknowledged the north and west facades are much simplified. It is considered the northern elevation would have benefited from further articulation of the ground floor of the central and western portions of the building to provide a more pleasing appearance to complement the visual interest provided by the placement and articulation of doors and windows. However, it is acknowledged these are not the primary elevations and is not considered to detract from the overall quality of the scheme.
- 6.49 In terms of materiality, the facades are expressed in a light grey brick with a light mortar reflecting the colouring of the chalk. This is supplemented by contrasting but complimentary feature green and orange tones that have been derived from the landscape of the cliffs, and plants such as the Ribwort native to the cliffs and the exposed topsoil which is eroded down the cliff face creating an ombre-effect stain turning brown into oranges and yellows. The application of these colours is proposed in the use of a green ceramic corrugated tile around windows and feature doorsets in orange aluminium frames. These moments of colour are employed to good effect to add a playful yet cohesive element to the building, that also helps to add a distinctive character to the more familiar grid patterns commonly found in contemporary facades. Final details of materials and architectural details are to be secured by condition.
- 6.50 In summary, the scheme translates the robust, industrial forms of concrete production facilities into an elegant composition that is characterful, civic and generous in its level of articulation across all facades. The scheme demonstrates a distinctive architectural language which will deliver a high-quality building and an individual style unique to other schemes permitted for the Market Centre, in accordance with the AMP and local and national planning policies. As such, the scale and appearance of the proposal is considered to be acceptable with further details secured by condition to ensure delivery of the quality identified in the submitted plans.

Landscaping

- 6.51 This reserved matter considers the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the Site and the area in which it is situated including screening by fences, walls or other means; the planting of trees, hedges, shrubs or grass; formation of banks, terraces or other earthworks; the laying out or provision of gardens, courts, squares; and the provision of other amenity features.
- 6.52 The NPPF states that planning decisions should aim to ensure developments are visually attractive as a result of appropriate and effective landscaping (paragraph 135) and recognises that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change (paragraph 136). Policy M1 of the Dartford Plan identifies the creation of high-quality landscapes and tree coverage as an element of good design and policy M14 states major developments should deliver a landscape scheme that is visually attractive, enhances biodiversity, uses native species, incorporates sustainable drainage

measures, and helps to mitigate and adapt to climate change. Delivery Theme 4 of the Ebbsfleet Implementation Framework emphasises bringing in the 'green' landscape to promote healthy landscapes and encourage active lifestyles. A framework for landscape design is captured within the EDC's Public Realm Strategy. Dartford Plan policy E2 states proposals in Ebbsfleet garden city should comply with the principles set out in this strategy.

- 6.53 The AMP sets out extensive detailing for the designs of open spaces and planting within the public realm. A tree strategy has been developed identifying different species to develop a narrative for different areas of the village, including details on preferred tree sizes. The Market Centre will contain trees that are formal in habit with clear stems. These will consist of well-designed avenue trees and specimens that will grow to have large canopies able to give a suitable presence against the larger buildings. Within the Market Centre character area, the AMP sets out that sufficient space should be made between buildings to allow public realm opportunities to occur to ensure vibrancy and a place that is for pedestrians to enjoy. It further sets out that private podium gardens should be used to cover over parking areas and allow the green of the Major Urban Park to filter into the blocks. Hard surfaced frontage plazas should be provided, incorporating trees, planters and areas of seating. Public spaces in this area should also incorporate street furniture comprising materials typical of urban environments.
- 6.54 Opportunities for landscaping are limited within the application site. The majority of the space is taken up by the building footprint given the ambition for larger, bulkier buildings in the Market Centre character area to emphasise its hierarchical importance. The remainder of the site to the rear of the building is occupied by parking to facilitate a sufficient level of service provision. This has implications on the amount of space available for landscaping and greening. However, the overall provision and quality of the landscaping is considered high quality.
- 6.55 Connectivity between the Hub and Fastrack Corridor is created through provision of a plaza with green verges and semi-mature tree planting to the front of the building, high quality hard landscaping with areas of seating and cycle parking, which provides an inviting, attractive and legible access into the main entrance of the building. A line of trees in verge planting will mirror planting to be delivered on the opposite side of the Fastrack corridor. A pathway is created around the eastern perimeter of the building which will be some 0.5m lower than the adjacent cycle path adjacent to the primary street. It will be separated by a low retaining wall with some form of boundary treatment. A strip of planting will be provided alongside cycle path to provide separation from the building and retaining wall
- 6.56 A small semi-private breakout space is created to the west of the building accessed from the health facility with a gated entrance from the car park featuring raised planters and benches. A small 'hall garden' is also created to the north of the building adjacent to the car park with feature tree and curved benches to provide a small spill out space from the hall. It is questionable how effective the use of these breakout spaces will be given their location and comparative scale to the facilities they are intended to serve. However, they are likely to provide some level of general amenity to individuals and provide opportunity for rest and social interaction as well as be visually attractive and create relief to the building form and are therefore welcomed.
- 6.57 More broadly, the hard landscaping throughout the site will be of a high quality. A mixture of block paving varieties is proposed for the majority of the site adapting size of paving, colour and bonds to demarcate different areas. A small section of tarmac is proposed to serve the main surface to the car park but this is limited since block paving

will be used at the centre to demarcate the proposed junction providing access to the adjacent parcels (4A and 4B).

- 6.58 Concerns were raised in respect of the level of planting within the car park. The landscape strategy identified 6 trees together with some smaller shrub planting. This does not comply with the EDC's guidance as set out in the Sustainable Travel Strategy which requires a tree planted between every 4 parking spaces to reduce the dominance of cars. Instead, multiple runs of 8 or 9 spaces are provided without a break. This was raised with the applicant and some amendments were made, introducing an additional tree to the western end, increasing the planting size of the Greenspire trees from 20-25cm to 30-35cm girth, replacing the tree in the 'hall garden' to an ornamental cherry tree, and replacing two trees at the entrance from the main road from ornamental cherries to more structured hornbeam. While the amendments are not significant it is considered the applicant has responded well in the context of the constraints of the site. The provision of a significant number of extra trees would compromise the availability of space and result in a reduction in car parking spaces, the provision of which have been carefully considered in response to identified demand. The planting strategy is improved in relation to their location and the additional tree and upgraded specification is welcomed. It is noted all trees upon planting will be semi-mature and will include an English Oak in the centre which is not a common variety seen in other planting plans within the wider development area and is a welcome addition. The two trees either side of the entrance have also been replaced with a more upright variety of Hornbeam which addresses Kent Highways comments to avoid varieties which would overhang the cycleway and thereby pose a safety risk for cyclists. While it is acknowledged the level of tree planting has impacted consideration of the Building for Healthy Life assessment (referenced below), on balance, retention of car parking spaces is considered to carry greater weight in respect of local and national policies which seek to avoid potentially harmful impacts on the highway from indiscriminate parking (e.g. policies M15 and M16 of the Dartford Plan) rather than the amenity value from planting when some landscaping has been provided. The scheme also complies with the Ebbsfleet Public Realm Strategy in relation to the provision of hard surfaces and planting scheme.
- 6.59 An External Lighting Assessment report was submitted with the application covering high level principles, together with a diagrammatic landscape lighting plan indicating broad locations of lighting. More detailed information was requested to confirm the likely impact of new external artificial lighting on sensitive receptors both on and off site and include design and specification to ensure appropriate lighting levels for users within the site. The applicant identified that the scheme is at RIBA Stage 2 design and therefore exact lighting positions and proposed lighting specifications have not been determined. Furthermore, details such as operating hours particularly for any external building lighting will be dependent on the operators which are not known at this stage. In the absence of any detailed information, the scheme has not been referred to the EDC's lighting consultant. The extent of the site is limited and no public streets are included. A lighting strategy plan submitted within DAS Addendum indicates the proposed location and type of lighting which are positioned in logical locations. It is considered the submitted information forms a reasonable basis for a detailed scheme which should be secured by condition. It is also noted that lighting should be included in and around the cycle store in the interests of sustainable travel, which will also be required by condition.
- 6.60 Overall, the proposals adopt a high-quality approach to landscaping, with breakout seating areas provided, a variety of bright and interesting planting species to compliment the development and soften building facades and a welcome palette of hard landscaping and street furniture. The extent of boundary treatment is limited

owing to the open character of the site but where they are shown, they relate well to this context. Final details of these together with street furniture, planters and soft/hard landscape specification, detailed lighting design and a landscape management plan will be conditioned.

Sustainability

- 6.61 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Section 14 sets out principles to meet the challenge of climate change and identifies the planning system should support the transition to a low carbon future including through support of renewable and low carbon energy and associated infrastructure (paragraph 157). In determining applications, LPAs should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (paragraph 162). Policy M3 of the Dartford Plan sets out the design, construction and whole life carbon cost of development must contribute to the mitigation of, and adaptation to, climate change by measures such as reducing embodied and operational carbon emissions, improving energy performance and preserving water. Other measures to preserve resources (such as non-residential development over 1,000sqm achieving BREEAM excellent standard, showing that available water credits have been met) and energy and carbon (requiring all developments achieving, as a minimum, the reduction in regulated carbon emissions as set out in current Building Regulations). It should also be noted that the EDC continues to work towards its vision to mitigate the effects of climate change and meet the UK's net zero targets for 2050, and has published its Sustainable Performance Framework (August 2023) covering 5 priority areas: Energy and Carbon, Water, Waste and Materials, Health and Wellbeing, and the Natural Environment. Each of these areas is examined in the appraisal below.
- 6.62 A Sustainable Construction Code and Water Conservation Plan have been secured as strategic documents for the whole of EQ in accordance with conditions 23 and 24 of the OPP which sets out methodologies and parameters that should be implemented for all developments across EQ. These strategies generally align to the current Building Regulations Part L and commits to water consumption of 105 litres per person per day. The strategies also encourage consideration of additional measures that could be implemented to improve the performance of buildings. For non-residential buildings over 1,000m² these strategies identify targets of BREEAM 'Excellent' overall, including an 'Excellent' rating within the water category, unless justification can be provided. However, the delivery of a rating in a standalone category is ambiguous since there is no separate assessment for water that enables an individual rating to be awarded. The credits awarded in this category for this scheme are set out below.
- 6.63 A Sustainability Statement prepared by Twin and Earth and Energy Statement prepared by Skelly & Couch have been submitted in support of the application. Also, although not a mandatory requirement, the application is accompanied by a completed sustainability checklist based on the emerging EDC Sustainability Design Guide which provides a helpful overview of the scheme's performance against key sustainability metrics. The Sustainability Statement sets out key objectives and demonstrates how the proposed development aims to respond to key sustainability principles and address local policy. The assessment has been made under a shell and core scope, on the understanding the developer is required under the OPP to deliver up to this finish for certain areas of the building (health facility, job centre, hall) and the final fit out required for the LLLC and Police accommodation is not yet known. The submitted report identifies the building will meet a pre-assessment BREEAM score of 81.16% falling within upper limit of the 'Excellent' rating (where 'Outstanding' is 85%). It is

recommended a condition is added to the decision notice to ensure that the BREEAM 'Excellent' accreditation is achieved.

- 6.64 The energy strategy has been developed following the Be Lean, Be Clean, Be Green energy hierarchy, incorporating a range of passive design and energy efficient measures such as target building envelope thermal performance (U-Values) improved on Part L, natural ventilation, high performance solar control glazing, good daylighting, LED lighting, efficient plant and associated controls, energy metering, air source heat pumps and PV panels. The submission states the building achieves a 26% reduction in carbon over Part L 2021 of the Building Regulations baseline. While figures provided for estimated emissions for whole life and upfront carbon scenarios meet building regulations, it is noted this is based on a shell and core construction rather than detailed design and is the minimum level of performance that is policy compliant. Operational carbon which includes space heating Energy Use Intensity (EUI) and renewables performs well. The focus for the scheme is on operational improvements through the use of energy generation through PV panels with heating and cooling to be provided via a Variable Refrigerant Volume (VRF) system, a type of air source heat pump. As identified in the comments from the sustainability adviser in section 4.7 above, initial concerns were raised in respect of overheating, a concern that was also raised by the ICB. Amended plans were received reducing the size of windows on the south, east and west façades, being those elevations that will receive direct sunlight. This change is welcomed (and has been designed well architecturally). The Sustainability Consultant notes the reduction in window area and development of cooling strategy referred to in the application will have a positive impact on carbon emissions, but consider that inclusion of solar shading would have an additional significant positive impact on both carbon emissions and the environmental quality of the south facing rooms. However, the recommendation for solar shading has not been provided in the building design. Consequently, there will be a greater reliance on mechanical mitigation (VRF system) which, while this type of system is welcomed to allow simultaneous heating and cooling in different areas, does have a knock-on impact on the overall carbon production and cost to the operator and therefore increases the whole life carbon figure which is undesirable. Notwithstanding this, as mentioned above, the Energy Use Intensity (EUI), which is the annual measurement of the total energy consumed in a building, is predicted to meet the net-zero best practice targets which is a positive aspect of the proposal.
- 6.65 On balance, therefore, it is noted there have been improvements through the reduction in the size of window openings and the overall performance is an improvement on the Building Regulations baseline. While further improvements in carbon and energy would be desired, the scheme sufficiently aligns with local policy and is therefore supported. Further clarifications in relation to the extent of PV (due to inconsistencies in the plans) is unconfirmed by the applicant. Opportunities to install a biosolar roof have been resisted by the applicant, however, the orientation and layout of the green roof (which meet ecological enhancement measures identified under the OPP – discussed in the Ecology section below) which is creating undesirable narrow channels which might affect successful establishment of the planting still needs review. A condition is therefore proposed for further consideration of the detailed design of sustainability features on the roof to ensure compliance with the targets set out in the reports submitted and to ensure that opportunities are maximised so far as possible.
- 6.66 The application states water consumption will be minimised within all elements of the scheme, reducing water demands by using low water-consuming components. A detailed water efficiency strategy is yet to be delivered under the detailed design stage but overarching principles for use of goods such as low water-consuming WCs, taps, showers and dishwashers and potential water leak detection system is identified.

Dartford Plan Policy M3 states that developments must achieve the BREEAM standard 'showing that available water credits have been met'. The BREEAM assessment submitted with the application identifies 3 of the 5 available credits for water consumption category (WAT01) and all available credits for the other 4 categories covering water monitoring, water leak detection and water efficient equipment, therefore targeting 7 of the overall 9 water-related credits. Accordingly this doesn't fully meet the requirement of Policy M3 in respect of water credits. The applicant has considered but dismissed inclusion of rainwater recycling for WCs to gain a further credit due to spatial constraints within the building as well as capital cost and significant maintenance costs of the system, whereas no justification has been provided for the 5th credit which has not been identified. However, on balance, the overall BREEAM target score for Excellent is high and most available water credits are being targeted, and demonstration of compliance is recommended through a planning condition, so this is considered acceptable. In respect of general best practice, measures suggested by EDC officers to introduce rain gardens within the parking area has been explored by the applicant and identified as deliverable within the planting area to the rear of the hall. While this does not address issues in respect of BREEAM rating, it is a welcome addition and would be secured by condition.

- 6.67 Performance indicators for Waste and Materials, Health and Wellbeing and Natural Environment are all good. There are areas which could be explored further but generally the scheme performs well, including factors such as provision of materials that are responsibly sources, limits of construction waste, sustainable location, provision of daylight and sunlight, increase level of biodiversity on site from existing, provision of green roof coverage and other urban design benefits achieved as a result of good masterplanning for the wider development site.
- 6.68 Overall, the development is using better practice than the baseline Building Regulation requirements but is not using best practice. While it is recognised further exploration could be undertaken in certain areas to enhance the building's performance overall, and further measures will be secured by condition, the improvements over and above Building Regulations are acknowledged and welcomed in accordance with policy expectations.

Highways & Parking

- 6.69 The NPPF strongly advocates early consideration of the impacts of development on transport as follows: to ensure impact on transport networks are addressed; identify opportunities from existing/proposed transport infrastructure; pursue opportunities to promote walking, cycling and public transport use; identification, assessment and mitigation of environmental impacts of traffic and transport infrastructure; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places (paragraph 108). Policy M15 of the Dartford Plan states that development must make suitable provision to minimise and manage transport impacts which arise and should include measures for active and sustainable travel. The policy also acknowledges the important role of the Fastrack corridor, requiring new major development sites to include layouts that allow for connections to Fastrack, buses and taxis to ensure good connections to make community services and jobs easily accessible to all users/employees. Policy M16 of the Dartford Plan supports active travel principles and identifies the need for travel plans where there are anticipated significant or negative impacts of transport movements. Provision should be made at applicable developments for loading, unloading and the turning of service vehicles to ensure highway and pedestrian safety. Development must ensure supporting facilities for cyclists, including secure cycle parking/storage and lockers, are provided, and in major developments which attract

significant numbers of people, changing areas and showers should be included. The policy also states an appropriate level and form of vehicle parking provision. The Ebbsfleet Implementation Framework seeks to deliver safe, integrated, and accessible transport systems, with walking, cycling and public transport systems designed to be the most attractive form of local transport (Delivery Theme 3 – Connected People and Places).

- 6.70 In respect of the individual phases of development in EQ, the overall impact of traffic movements has been established under the OPP. No greater parking demand or traffic movements would be generated by this permission than assessed under the OPP. A separate assessment is therefore not necessary in this instance.
- 6.71 The OPP for EQ recognises that development of a site at this scale offers unique opportunities to establish its own strategy which maximises benefits offered by sustainable transport initiatives. It therefore sets out a requirement under the s106 Agreement for submission of a Parking Management Plan (PMP). The vision for EQ is a 'public transport orientated development' where the principle that the use of 'walking, cycling and public transport to meet daily travel needs will challenge the historic default use of the car' (PMP paragraph 2.1.2) has been embedded and thereby fosters a healthier lifestyle and promotes community interaction. Parking standards are identified for detailed applications.
- 6.72 The EDC has produced further guidance in the form of the Sustainable Travel Strategy (STS) which promotes a 5-step approach by firstly promoting the use of sustainable travel, aligning parking provision appropriately, locating parking discretely, enabling vehicle charging and proactive management. This approach has been endorsed by KCC Highways and DBC. In addition to the PMP, the EDC's STS is a material consideration in the determination of planning applications in Alkerden as identified by Policy E2 of the Dartford plan which states that developments within Ebbsfleet should comply with the STS. While the EQ PMP has been developed as a bespoke standard to the site, the more ambitious approach to parking standards set out in the STS, which is based on more up-to-date parking surveys than the PMP, is considered to be more appropriate in this centrally located, highly sustainable site.
- 6.73 The site is identified in the AMP to provide a centralised parking area, together with 2 other locations within the Market Centre. While the AMP does not expand on this designation, it is understood these parking areas are intended to serve the commercial and community uses delivered within the Market Centre character area.
- 6.74 It is also important to note that the Alkerden education campus was subject of a section 106 Unilateral Undertaking requiring provision of off-site spaces within the Market Centre to facilitate school drop-off and pick-ups for the primary and secondary schools. A total of 41 spaces are required to be provided within parcels identified to the west and/or south of the campus. To date, 30 of the 41 required spaces have been secured under the approved first phase of the Market Centre (EDC/22/0084).
- 6.75 In order to determine an appropriate parking provision, an analysis of likely trips generated by land uses within the Hub has been applied rather than adopting calculations for each individual use. The proposal therefore seeks to develop a car park which can accommodate differing users depending upon the time of day. This is considered to be an appropriate approach given the nature of the use of the site, the flexibility of spaces within the Hub, likely shared trips and the readily available public transport. The principle of over-providing car parking spaces is not supported as it would create a greater reliance on car parking availability and a greater reliance on the car for single trips. This is not supported by the PMP, STS or local and national

policies. Given the facility is intended largely to serve residents of EQ, the walking distances for most properties to the site and the availability of over 90% of properties within EQ falling within 400m of a Fastrack bus stop, the accessibility of the site lends itself to a lower car parking provision. Furthermore, the PMP supports opportunities to provide parking spaces that can be shared between land uses to make more efficient use of the land. The overall strategy is therefore supported by EDC Officers and Kent Highways and is recognised as an approach which was also applied to the approval granted for the approved first phase of development in Alkerden Market Centre (EDC/22/0084).

- 6.76 Parameters used to inform the trip generation exercise were agreed with Kent Highways as pre-application matters. Trip rates have been extracted from the TRICS database (used for transport planning purposes specifically to quantify the trip generation of new developments) for uses within the Hub to allow a forecast to be made of the likely vehicle trip generation for the site and resulting parking accumulation profile across an average day to identify likely demand at the site. The resulting trip generation figures have then been used to derive a parking accumulation to establish the forecast parking demand for the development based on the floor area of proposed uses within the Hub. The forecast assumes full occupation of 11 spaces in association with the Education Campus during drop-off and pick-up times, assuming the spaces cannot be used for any other users.
- 6.77 Consequently, the results of the forecasting assessment demonstrate a peak demand for 35 parking spaces between the hours of 15:00-16:00 which coincides with the typical school pick-up period. Demand for parking can be seen to remain fairly constant between 08:00-16:00 before reducing. By 18:00 demand reduces significantly to single figures. The forecast trip generation includes all trips including servicing and delivery, staff and visitors and all vehicles which would include motorbikes. The figures and assessments set out in the Transport Assessment have been interrogated by Kent Highways who agree with the findings. The proposed provision on site is for an overall number of 43 public parking spaces (including 1 service bay – since the forecast trip generation includes all servicing and delivery trips) which will accommodate the peak demand with a level of spare capacity of 7 car spaces to meet any variations in demand or increases in dwell time by site users. This provision does not include the ambulance bay proposed within the car park which will serve the health centre and deliver on the obligation as set out in the OPP for delivery with the health facility.
- 6.78 Of the 43 spaces, 4 spaces are proposed to be delivered as accessible spaces which are located near the health facility entrance. The STS identifies standards for non residential uses but does not set out standards for mobility impaired parking for all use classes. For Use Class E, the standard requires 4 designated mobility impaired spaces or 5% of the total capacity, whichever is greater. The proposal therefore complies with the STS requirement. At present, no specific provision has been made for parking of mobility scooters, although accessibility in and around the building would facilitate them. The Accessibility Statement (p.88 of the DAS) identifies this is to be explored further at the next stage of design development. While there are no specific policy requirements, this would support principles of accessible design and sustainability and should therefore be conditioned as part of the parking management considerations.
- 6.79 Of the 43 car parking spaces proposed, it is proposed 10% will be provided with active EV charging provision and 10% will be provided with passive EV charging provision (i.e. wiring and cable conduit in place under the car park for future use) which is in accordance with the STS, details of which would require approval through planning condition.

- 6.80 The proposed car park layout incorporates a single large bay which has been included specifically to serve as a servicing and delivery bay. The bay is positioned close to the hall for convenience. A Servicing and Delivery Plan has been submitted which forecasts the number of servicing trips associated with the Hub using TRICS data to forecast a total of seven vehicles servicing/delivering to the site across a single day (07:00-19:00). Based upon an average dwell time of 30 minutes, the delivery and servicing bay has capacity to serve 24 vehicles over a twelve-hour period which is well in excess of anticipated demand. The submitted Servicing and Delivery Plan sets out recommendations for monitoring and review which can be controlled by condition to ensure servicing activity is operating in an efficient way.
- 6.81 Cycle parking provision has been provided in accordance with the STS, amounting to 41 spaces which will be covered and conveniently located on the southern elevation adjacent to the Fastrack corridor by the front entrance to the building. It offers 41 'Sheffield' type cycle stands with 5% capable of accommodating cycles of greater width. Changing areas and lockers are to be provided in both the health facility and LLLC. Showers are to be provided in the health facility but have not been identified for the LLLC. This has been raised with the applicant who advised they are not currently proposed. It is recognised Policy M16 of the Dartford Plan seeks to deliver showers and the applicant has accepted the provision of a condition to explore additional provision.
- 6.82 A Framework Parking Management Plan has been submitted with the application which identifies key principles in relation to control and management of the car park, including allocation. It suggests that discussion with the ICB indicated spaces are sought to be allocated to the health facility and 4 spaces for GP doctors. The Highways Consultation Response (dated September 2024) suggests that, given the limited number of spaces, *'allocation will be kept to a minimum to maintain the most flexibility within the car park. Promotion of non-car modes is key with the Parking Management Plan servicing to manage those trips which do occur by car'*. It is acknowledged there are still uncertainties regarding the operation of the Hub while service delivery is still unknown. It is therefore recommended the provision of any allocation is agreed through a final Parking Management Plan which will be secured by condition and address any other relevant requirements to ensure effective and efficient use of the car park.
- 6.83 A Travel Plan (TP) has been submitted with the application which identifies parameters for identifying baseline travel patterns, objectives and measurable goals for awareness and promotion of active travel, management of the Plan and its objectives through the appointment of a Travel Plan Co-Ordinator, and a monitoring and review strategy. The TP is accepted by Kent Highways with a recommendation that a full TP is required to ensure suitable measures are tailored to the occupiers of the site and updates as required. This will be secured by condition.
- 6.84 The overall approach to parking is a well-considered strategy which has responded to aspirations to lower demand on the private car. The strategy is compliant with the STS and has effectively followed the 5 steps to orientate the transport towards 'soft' modes of transport, while providing a balanced approach to car park provision. Consequently, the scheme complies with local and national policy.

Amenity & Site Management

- 6.85 The NPPF seeks to deliver good design which creates better places in which to live and work (paragraph 131) and requires planning decisions to create places that promote health and well-being with a high standard of amenity for existing and future

users (paragraph 135). Policy M2 of the Dartford Plan states development must demonstrate it is design not to result in unacceptable material impacts on neighbouring uses, the Borough's environment or public health, having particular regard to noise disturbance or vibration, odour, overshadowing, overlooking and privacy.

- 6.86 It is acknowledged the proposal will result in significant activity that will potentially impact on the amenity of neighbouring residents. The application site is located in an area allocated for high density. Mixed use parcels are allocated to the south on the opposite side of Fastrack, the education campus is under construction to the east. Parcels immediately adjoining the site to the west and north are identified for mixed use/residential. There are no immediately adjoining residential units, the closest being under construction in Parcel 5B some 100m to the north at the closest point. However, it is acknowledged given the tight grain of the character area, there will be residents located close by in the future which will have to have regard to any existing development. Notwithstanding, in the interests of future-proofing and not hampering future schemes, regard should be had to the potential impact of the proposed scheme. Overall, however, the level of activity to be generated by the development has been carefully masterplanned and is compatible with this area of the site.
- 6.87 The layout of the site and relative distances from adjacent plots to the east and south provide sufficient separation such that overlooking or overshadowing will not occur. Given the parameters in the AMP in relation to density and building heights, the proposed Hub and any future buildings to the north and west should be of a similar scale such that the development would not be overbearing. An Impact Shadow Assessment has been submitted with the application which includes renders of development blocks in the adjacent parcels at 4A and 4B and shows very limited impacts of overshadowing from the Hub. Notwithstanding this, consideration will need to be given to issues such as overlooking and overshadowing on any future scheme to the north and west and associated amenity for these individual schemes designed accordingly. Notwithstanding, the east elevation of the Hub has been designed with a staggered form and with windows positioned in such a way to have regard to mitigating potential overlooking that might occur. With regards privacy of the users within the proposed building, relative site levels to the health centre elevate the first floor and together with proposed landscaping providing separation from the public realm and the scale of the openings, is considered to address issues of overlooking that had been raised previously. The large openings along the south and east of the Hub will serve communal areas including the library, café and reception area which will benefit from the increased light and outlook amenity that would be created.
- 6.88 In accordance with condition 28 of the OPP, developments which abut a principal highway shall be accompanied by a detailed noise assessment and mitigation report. The submitted report has been examined by the EDC's noise consultants, Bureau Veritas. The report seeks to demonstrate the proposed commercial operation of the Hub will not adversely impact on nearby residential receptors (both existing and proposed). Noise surveys were undertaken, with a comparison to previous surveys undertaken for the 2006 Environmental Statement under the original OPP, to provide a robust basis for assessment, and an analysis of plant noise from building services plant located on the roof of the proposed Hub (including the proposed VRF system). Bureau Veritas are satisfied with the findings of the report but only insofar as the plant located on the roof of the Hub can be controlled so as to not result in unacceptable impacts at future nearby residential buildings (once built and occupied), however this is subject to subsequent testing once the plant is installed and operational. A condition is therefore recommended to ensure installation of the plant meet the proposed noise limits as set out in the submitted Noise Assessment.

- 6.89 It is noted that there are several possible activities that might take place within the Hub that are likely to generate noise. In relation to internal acoustic detail, noise spill from within the building on users within and outside the building are covered by relevant guidance and British Standards which will be applied through the detailed stage and managed through Building Regulations. Notwithstanding this, relevant conditions should be imposed to adequately manage impacts on neighbouring amenity including control of the hours of operation of the building and associated plant.
- 6.90 The proposed operation of the café has been expressed as a 'grab and go' service using a similar model as high street café with limited menu options, likely to be prepared off-site. No extraction is therefore currently proposed. However, it is considered a condition should be added should a flue/extraction system be deemed necessary to ensure there is no harm to amenity should they be required in the future.
- 6.91 A framework Management and Maintenance Framework has been submitted identifying overarching aims to provide for the community, potential spaces and users, planned opening hours, pricing and booking system, marketing, governance and management, maintenance and statutory responsibilities (Health and Safety etc.). The application sets out that it is expected a detailed management strategy will be secured via a planning condition when further details on the management arrangements are known. This is accepted. Details to be secured by the final management strategy will include opening hours. The currently proposed opening hours for access by the community are 08:00-22:00 Sunday to Thursday and 08:00-00:00 Friday and Saturday, with a note that extended hours may be applied on occasion to accommodate faith-based observances where access would be limited to specifically hired spaces. A midnight closure is late and falls within nighttime hours which are generally considered to be between 23:00-07:00. There is some concern that, depending on the type of activity being carried out within the building at that time and the associated movements from people leaving the Hub it may generate, it may cause unreasonable disturbance to adjacent residents. While it would be undesirable to limit certain events through a restriction on opening hours in the interests of commercial viability a balance must be struck and, while the nature and frequency of operations at night is unknown, it is considered that final opening hours should be controlled through the final management strategy and liaison undertaken with environmental health consultants.
- 6.92 Due to the nature of the site, it is not anticipated there will be frequent servicing and delivery at antisocial hours. While the exact operations of the site are unknown, the nature, frequency and timing of deliveries is also unknown. However, it is considered the impact on amenity can be controlled by the recommended condition in relation to the Parking Management Plan.
- 6.93 It is considered the proposal has been well considered with regard to amenity and further controls to limit impacts will be secured by condition.

Ecology

- 6.94 A core principle of the NPPF is that new development should maximise opportunities to improve biodiversity and planning decisions should contribute to and enhance the natural and local environment (paragraph 180). Developments should also protect and enhance diversity and integrate opportunities to improve biodiversity in and around developments as part of their design (paragraph 196). Policy M14 of the Dartford Plan sets out requirements in relation to the Habitats Regulations (this is set out in the 'Other' section of the report below) and Biodiversity Net Gain. In this instance, since the application is for reserved matters pursuant to an outline planning permission,

statutory Biodiversity Net Gain is not required. However, it is acknowledged the overall improvements to the site the wider development will bring by delivering managed ecological habitats to a former quarry, including the provision of over 40% of open space across the wider EQ site.

- 6.95 The details of ecological works mitigation measures and monitoring have been secured under the OPP. On-site and future works are being monitored by KCC Biodiversity Officers. The ecological statement submitted with the application identifies a site visit was carried out in February 2024 and as a result of the findings and the previous mitigation and use of the site, it was deemed to have low ecological value. At the time of the report (May 2024) it was identified that if vegetation is allowed to establish on site, it may become habitat for nesting skylark and reptiles. KCC Ecology therefore recommended that at the end of the breeding bird season the vegetation must be regularly cut as part of the site-wide management to prevent habitat establishing on site as this may affect protected species when the site is developed.
- 6.96 However, information from the applicant from October 2024 identifies that while stock pile has been removed from the site since the initial survey and the majority of the site now comprises bare earth, vegetation edges as noted in the original report remain and it was not confirmed these had been cut back regularly since May. Consequently, it is recommended a pre-commencement condition is added requiring vegetation clearance to be carried out under an ecological watching brief to ensure the works avoid a breach of wildlife legislation. The applicant has agreed to this pre-start condition.
- 6.97 A Site Wide Biodiversity Action Plan (BAP) has been secured for Alkerden and Ashmere in accordance with condition 15 of the OPP which recognises that while the built environment will not be primarily designed for biodiversity, careful design can add value and biodiversity can be enhanced. KCC Ecology have welcomed the native and wildlife-friendly planting that has been incorporated into the proposed planting with at least 25% as native species which generally accords with the approved BAP. Other ornamental tree and shrub species are recommended to make the 100% of planting but the limitations on site for planting and the choice of species to reflect the environment are acknowledged.
- 6.98 Species specific measures to be included as part of the development are also identified in the BAP and a limited number of features are relevant to reserved matters applications, including bird boxes, bat boxes and green roofs. In accordance with the BAP it is recommended at least 5 bat and 5 bird boxes are installed. The applicant has confirmed agreement to provision of these and the principle of a condition to secure final details.
- 6.99 The BAP also identifies green roofs are to be provided as 20% of total roof areas of buildings with a roof area greater than 250 m². The submitted roof plan identifies an area of 21% of green roof which is welcomed and accords with the BAP. As identified in the Sustainability section of the report above, there are some concerns regarding the effectiveness of the proposed layout since there are narrow channels which could challenge effective establishment of the proposed planting and opportunities to further enhance the green roof with additional PV cover to provide a biosolar roof are identified. It is therefore considered an appropriately worded condition will allow further exploration of this detail with the applicant.

Building for a Healthy Life (BHL)

- 6.100 NPPF Paragraph 138 states that Local Planning Authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of the development. These include design advice and review arrangements and assessment frameworks such as Building for a Healthy Life (BHL). BHL is a design tool to measure and assess good design that is supported by the housebuilding and architectural industries as well as Government and Local Authorities.
- 6.101 A BHL assessment of the scheme has been undertaken by EDC officers and the results are summarised below:

Integrating the neighbourhood

1 Natural Connections	2 Walking, cycling and public transport	3 Facilities and services	4 Homes for everyone (Not Applicable)
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Distinctive Places

5 Making the most of what's there	6 Memorable Character	7 Creating well defined streets and spaces	8 Easy to find your way around
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Streets for all

9 Healthy Streets	10 Cycle Parking and Car Parking	11 Green and Blue Infrastructure	12 Back of footpath-front of house
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- 6.102 The proposed development has been scored against 11 BHL questions (criterion 4 is not applicable in this instance since the proposal is for community use), achieving 10 greens and 1 amber.
- 6.103 It is noted that while the scheme provides a level of car parking and cycle parking that is generally aligned with the requirements of the STS, provides EV charging and is well overlooked, the STS guidance on parking areas requires a tree planted between every 4 parking spaces. The car park to the rear fails to deliver on this requirement where multiple runs of 8 or 9 spaces are provided without a break, including at the western end of the car park, which limits opportunities to incorporate planting to soften the future phase in Parcel 4B to the west and potentially be detrimental to the outlook from this future development. As such, Criterion 10 has been classified as amber since it does not meet all requirements.
- 6.104 Overall, the proposal is considered to perform extremely well and the results of the BHL assessment are acceptable.

Other Matters

- *Environmental Impact Assessment (EIA):*

- 6.105 The outline permission was identified as being EIA development and the likely significant effects of the development on the environment were identified and assessed at the time of the outline application. If effects arising from the proposals set out in an application for approval of reserved matters were not identified or identifiable at the time of a decision to grant OPP and were therefore not assessed at the time of that decision, then an assessment must be undertaken at the reserved matter stage.

However, it is EDC officers' opinion that all likely significant environmental effects were identified and assessed as part of the outline permission application process and that the information before the planning authority is adequate to assess the significant effects of the development on the environment, and therefore it is not necessary to serve a notice seeking further environmental information.

- *Habitats Regulation Assessment:*

6.106 Projects likely to have a significant effect upon a protected site are to be subject to an Appropriate Assessment of their implications for the Site in the context of its conservation objectives, provided that the project is not directly connected with or necessary to the management of the protected site. Policy M14 of the Dartford Plan requires large residential developments located within 10km from the North Kent European Protected sites (that are located outside the Borough) to undertake a Habitats Regulation Assessment to demonstrate that the mitigation measures proposed are satisfactory to avoid potential adverse recreational effects to protected features. These European Protected Sites located on the North Kent coast are the Thames Estuary and Marshes Special Protection Area (SPA) / Ramsar (wetland sites of international importance), the Medway Estuary and Marshes SPA / Ramsar, and the Swale SPA/ Ramsar sites.

6.107 In this instance, while the development is situated within 10 km 'as the crow flies' of the Thames Estuary and Marshes Special Protection Area (SPA) / Ramsar (wetland sites of international importance), the proposal does not include any residential development and EDC officers consider that, having regard to the nature and detail of the proposal, the development would not be likely to have a significant effect on the protected sites and would not result in potential adverse recreational effects to protected features within the designated site. It is accordingly not considered necessary to carry out an Appropriate Assessment.

- *Archaeology:*

6.108 Condition 26 of the outline permission requires that details of foundations are provided with any detailed application to ensure that no harm is caused to any archaeological interest. Investigation of archaeological potential at EQ has already been examined in association with conditions 13 and 14 of the OPP and the Historic Environment Framework which was also approved under the OPP. This Framework identifies the application site is located within an area of 19th/20th century quarrying which was excavated to significant depths. It therefore concludes that there is no potential for redeposited or undisturbed Palaeolithic remains or any potential for remains of other periods. Since this has already been identified by approved documents pursuant to the outline permission and groundworks have already been carried out at the Site, it is not considered necessary that foundation designs are required since no harm would arise, particularly at that depth. It is therefore considered that the application of condition 26 is not relevant in this instance and foundation designs have not been requested.

- *Drainage:*

6.109 A strategy for the general handling of surface water and foul water has been secured by the Water Management Plan under the outline permission. Proposals for detailed design are required to accord with the strategy set out in this document. A drainage report has been submitted with the application which refers to the Water Management Plan secured under the OPP. The report identifies a 600mm diameter surface water connection at the southwest corner of the site to the main 1200mm surface water drain in the road to the south. This drain flows west to discharge to a swale in the park area

and into the southern lake with attenuated discharge to the River Thames. The connection from the plot allows for an attenuated discharge from up to 0.8Ha and this has been respected in the proposed surface water design on the Hub plot. Detailed plans and relevant calculations have been provided. KCC have been consulted and confirm that officers have no objections to the proposals.

6.110 Water and sewerage services are provided by Independent Water Networks Limited (IWNL) in accordance with agreements made by the sitewide landowner. Southern Water have acknowledged this arrangement as part of the consultation for this application and have confirmed there is an inset agreement/NAV agreement in place between Southern Water and IWNL against which connection/discharge points to the public network and agreed discharge flow rates are agreed. They raise no objection to the proposal. Therefore, it is considered that matters relating to drainage and flooding have been adequately addressed and that the proposed development will not give way to increased risk of flooding.

- *Broadband:*

6.111 A Utilities Framework has been secured under the outline consent as strategic documents for the whole of EQ in accordance with condition 16 of the OPP. The statement identifies Independent Fibre Networks Ltd (IFNL) will secure a network connection offsite. On site Convergence Point (OSCP) to be built within the site and fibre networks laid in ducts around the infrastructure roads.

6.112 The application states the intention is to make broadband connectivity available which will be easy and accessible for users whilst adhering to good practice policies that include inclusion of the use of WiFi on all hire agreements, noting suitable clauses covering the Broadband/WiFi. Display notices that make it clear to potential users that the use of the Wifi is at their own risk and will encompass a 'captive portal' which includes a customised login page that users must address before connecting to the Wi-Fi network. This will also allow us to show users the terms of service to use the Wi-Fi hotspot, which they must agree to before they can use it.

6.113 No information has been provided regarding the speed and capability of the proposed broadband network. However, it is considered imperative that an appropriately high-speed connection is provided in the interests of successful operation of the multiple businesses and services that are likely to be working from within the Hub.

- Condition 25 – Outstanding issues

6.114 All relevant matters listed in condition 25 of the outline permission (in relation to details required for reserved matters applications) have been addressed in the application and there are no outstanding issues.

6.115 The final detail design of some of the items, such as specific materials for the external appearance, hard and soft landscaping, cycle storage and lighting are secured by condition.

- Local Employment

6.116 An Employment Action Plan is secured under the S106 agreement associated with the OPP. This requires the owner to use reasonable endeavours to implement a plan from the start to the completion of the development, to encourage the employment of local residents and local companies as a contribution to the regeneration of the local

economy. The EDC is working with the major landowner to help implement the effective implementation of this plan in line with EDC objectives for local employment

7.0 FINANCIAL CONSIDERATIONS

7.1 Regard should be had to any local finance considerations in so far as material to an application for planning permission and, while this is not material to this application for the approval of reserved matters, financial benefits will accrue to the area if permission is granted. The Government wishes to ensure that the decision making process for major applications is as transparent as possible, so that local communities are more aware of the financial benefits that development can bring to their area. In this area although not material to the application the following benefits to the public purse accrue from development – business rates in respect of the health facility, lifelong learning centre and multi-use hall.

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 EQUALITY 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 the application proposals would comply with objectives of the Duty.

10.0 CONCLUSION

10.1 The proposed scheme is considered to be of high-quality design which aligns with the AMP and local and national policies. The scheme delivers on obligations required under the outline planning permission to deliver a well designed and well considered building which will be a centrepiece within the Alkerden Market Centre.

10.2 The application is therefore recommended for approval.