Ebbsfleet Development Corporation (LPA) – Hearing Statement – Matter 6

1. Introduction

1.1. Ebbsfleet Development Corporation (EDC) is the Local Planning Authority for Development Management purposes for land within the EDC Urban Development Area (UDA).

2. Response to Inspector's Matters, Issues and Questions – Stage 2

2.1. This Hearing Statement responds to Matter 6 – Strategy for Ebbsfleet and Swanscombe.

Policy E1 – Ebbsfleet and Swanscombe Strategy

76. Is policy E1 sufficiently clear on the quantum of different forms of development that are being planned at Ebbsfleet?

- 2.2 Policy E1 sets out the strategic approach for the Ebbsfleet and Swanscombe area. The policy supports the delivery of a garden city at Ebbsfleet which is consistent with the EDC's vision that was developed following engagement with partners and continues to evolve. This is confirmed in the statement of common ground between DBC and EDC (SCG-6 page 6).
- 2.3 The policy indicates a focus on the important components of a place including mixed neighbourhoods, green space and sustainable travel. It recognises the relationship of both the existing settlement of Swanscombe and the Swanscombe Peninsular Site of Special Scientific Interest (SSSI) to the planned new communities. The quantum of development forms is identified elsewhere in the Plan.
- 2.4 EDC considers that the policy wording is appropriate when considering the Plan as a whole. The policy will support the delivery of the vision for Ebbsfleet.

77. Is policy E1(6) consistent with the approach set out in document EXAM6 in respect of the likelihood of any pitches or plots being available for gypsy and travellers and travelling showpeople?

2.5 As identified in the statement of common ground between EDC and DBC, the EDC is committed to continue to explore opportunities for the provision of plots for gypsies, travellers and travelling showpeople across Ebbsfleet. However as identified in document EXAM6 the extant planning permissions and constraints across Ebbsfleet has resulted in limited opportunities being identified.

Policy E2 – Ebbsfleet Garden City Development Principles

78. Is the policy sufficiently clear as to the infrastructure requirements that will accompany any remaining phases of the Garden City?

- 2.6 The policy identifies the need for development to provide for a range of infrastructure including homes, district/local centres, open space and ecological enhancements. This is consistent with the principles and infrastructure needs set out in the Ebbsfleet Implementation Framework.
- 79. Criterion 1(e) indicates that buffers will be created in between developments and the Site of Special Scientific Interest (SSSI). What type of buffers are envisaged?

- 2.7 EDC will work with Natural England on the type of appropriate buffers as schemes come forward in these areas.
- 80. Is the relationship between policy E2 and the Ebbsfleet Implementation Framework, the design for Ebbsfleet Guide, the Ebbsfleet Public Realm Strategy and the Sustainable Travel Strategy sufficiently clear? What status do these documents have and will any principles embedded in these documents support the implementation of any subsequent planning consents or reserved matters applications?
- 2.8 The EDC as LPA use these documents for development management purposes. The documents were subject to engagement with stakeholders and are supported by the EDC board. The EDC advise applicants that these documents outline how a scheme can be designed to comply with Local Plan policies. The principles outlined in the documents are embedded into planning permissions, masterplans, design codes as they are bought forward.

Policy E4 – Ebbsfleet Central Allocation

83. What is the basis for the scale and range of development types proposed and are these justified?

- 2.9 The Ebbsfleet Implementation Framework, which sets out the vision for Ebbsfleet, identifies Ebbsfleet Central as the dynamic heart of the area, stating: -
 - "Ebbsfleet Central will become a dynamic new heart for Ebbsfleet, a major commercial hub and a centre of excellence for medical, education and learning. This dynamic focus of uses will be supported by a diverse mix of residential, health and leisure uses, with associated bars, restaurants and convenience shopping to support active and lively streets."
- 2.10 Following the purchase of the site in 2019, the EDC has further developed this vision as follows: -
 - "At the heart of the Garden City, Ebbsfleet Central will capitalise on its unparalleled connectivity to deliver the next generation of high quality, flexible workspace, creating a new dynamic and innovative sub-regional business hub integrated through well designed public realm and green spaces with vibrant, sustainable urban neighbourhoods and amenities to support a healthy, happy lifestyle"
- 2.11 The scale and range of development types identified in the policy will enable the realisation of the overall vision for Ebbsfleet by forming a 'heart' to the new communities. The policy is in line with the overall spatial strategy for Dartford and the Ebbsfleet Implementation Framework.

84. What are the expectations in terms of the timing and rates of housing delivery? Are these realistic? What evidence is there to support the anticipated timing?

- 2.12 Housing at Ebbsfleet Central is expected to be delivered across three phases following an initial phase of infrastructure starting in 2024. The programme for housing delivery is expected to be:
 - Commencement of Phase 1 (EC2) Development: 2027 2034
 - Commencement of Phase 2 (EC1) Development: 2032 onwards
 - Commencement of Phase 3 (EC4) Development: 2034 onwards

2.13 The rate of delivery of residential development is consistent with the rates of housing delivery seen elsewhere in Ebbsfleet. The programme is supported by DLUHC as the EDC sponsor department.

85. What effect does the designation of the Swanscombe Peninsula SSSI have on the amount and timing of development planned at the Ebbsfleet Central Allocation?

2.14 The Ebbsfleet Central allocation does not include any land falling within the Swanscombe Peninsular SSSI and so the designation will have no direct impact on the amount or timing of development at Ebbsfleet Central.

86. What are the requirements for infrastructure and are these justified? What funding mechanisms are in place to support the timely delivery of the required infrastructure?

- 2.15 Paragraph 4.36 identifies a requirement for a minimum of a 2FE primary school together with strategic medical facilities. Paragraph 4.37 identifies a requirement for walking, cycling and Fastrack infrastructure. Paragraph 4.38 outlines the role of the International Station as a transport hub for the area. This infrastructure is then set out within Policy E4(5)(c), E4(2)(e & f) and E4 (2)(d).
- 2.16 Infrastructure requirements across Ebbsfleet Central were first examined as part of the extant planning consent approved in 2002. These requirements were reviewed as part of the drafting of the Ebbsfleet Implementation Framework and more recently reviewed through the development of the emerging new masterplan. The infrastructure has been identified following liaison with service providers including Kent County Council and health providers. This regular liaison will continue to take place during the consideration of forthcoming planning applications for the site and the provision and timing of infrastructure will be secured through planning conditions and obligations.
- 2.17 Policy E4 targets the delivery of infrastructure through the development of the site and this is supported. The development will also be subject to CIL which will allow for the Council to invest in infrastructure in the wider area.

87. Is the policy sufficiently clear as to what is being sought as part of the requirement for a new public transport hub?

2.18 The Ebbsfleet Implementation Framework defines the transport hub as:

"A transport hub will be developed connecting Ebbsfleet International and Northfleet Stations, providing interchange with Fastrack and local bus network as well as the potential requirement to accommodate potential LPER arrivals and departures at the station. Pedestrian and cycle linkages will be improved from surrounding communities, in particular Swanscombe and Northfleet. Improved cycle facilities will be encouraged as part of the hub."

2.19 This is reflected in the Local Plan in Policy E4(2)(d) and (f) and is sufficiently clear.

88. Is the requirement for 30% open space justified?

2.20 The provision of both green and blue infrastructure is an important component of the garden city and its provision is required across other development sites in the area. EDC

is therefore content that Ebbsfleet Central should not deviate from the approach seen elsewhere.

Policy E5 – Alkerden and Ashmere Allocation

89. What is the basis for the scale and range of development types proposed and are these justified?

2.21 Alkerden and Ashmere are expected to be largely delivered pursuant to the extant planning permission granted under EDC/17/0048 for the Eastern Quarry development. This permission grants maximum development floorspace as well as parameters for strategic matters such as open space and movement corridors. Furthermore a site wide masterplan, area masterplans and design codes have now been approved. These area masterplans and design codes are village wide - one for Alkerden and one for Ashmere. The documents take the maximum parameters and agree a scale and range of development types that are expected to be delivered in each village. A district centre is identified for Alkerden and a Local Centre for Ashmere. Phase 1 of the District Centre is currently subject to a live planning application being considered by EDC (EDC/22/0084) and advanced discussions are underway on phase 2/3 with submission expected in October/November.

90. What are the expectations in terms of the timing and rates of housing delivery? Are these realistic?

- 2.22 EDC understands that the timing and rates of housing delivery have been provided by DBC in response to Q47. EDC has shared information to support this response.
- 2.23 The EDC works closely with landowners and housebuilders across Ebbsfleet to understand the delivery of homes across the area. For Alkerden and Ashmere in particular we have detailed forecasting from the landowner covering each parcel. Current information on annual forecasts for start and completions is reported to EDC board every 6 weeks together with regular reviews of the whole build out. The data from developers from examined by reviewing the status of planning permissions, the delivery of initial infrastructure and past delivery rates.
- 2.24 Alkerden is being delivered by multiple developers who are delivering a range of products. This will lead to multiple outlets at any one time. Furthermore the form of development in the District Centre where higher density is proposed will lead to higher numbers of completions at once. Ashmere is being developed by one joint venture and we are working closely with them to understand the phasing of different products across the village.
- 2.25 The developers on most sites in Alkerden and Ashmere have been building on other sites in Ebbsfleet and so we have a good understanding of their approach to delivery.

91. What proportion of specialist accommodation is expected to be delivered on the site?

2.26 The landowner for Eastern Quarry has identified an area of land in Ashmere which could deliver 250 units of specialist housing. EDC expects this to come forward as housing for older persons. EDC has been supporting the diversification of housing products in the area and in particular the delivery of older persons accommodation following the designation of Ebbsfleet as a Healthy New Town. Specialist accommodation in Ashmere is therefore supported in principle.

92. Is the expectation in criterion 3c) sufficiently clear as to the quantum of community uses envisaged?

2.27 The community uses are expected to be delivered pursuant to the outline planning permission. The quantum and range of uses are set out in the section 106 agreement and a series of strategies which were either approved at outline stage or subsequently. The planning permission allows for flexibility in their timing and final size/form subject to the needs of service providers such as Kent County Council and health partners at the point of delivery. The exact details will be agreed through reserved matters applications when delivery triggers are reached.

93. What are the requirements for infrastructure and are these justified? What funding mechanisms are in place to support timely delivery of the required infrastructure?

2.28 Infrastructure requirements are set out in policy E5(2). These requirements have been agreed and secured through the outline planning permission, the site wide strategies and section 106 agreement. This permission was amended under s73 most recently in 2018 and developers are currently on site meeting the terms of the permission.

94. How much strategic and local greenspace is required by the policy? Is it sufficiently clear?

2.29 The amount of strategic and local greenspace is outlined in policy M14(1) which identifies at least 30% of the site area for sites of 20ha and over should contribute to the green and blue network. Policy E5(2)(e) requires the delivery of high quality new strategic and local greenspace, including at Craylands Gorge and other north-south ecological corridors and a major park between Alkerden and Ashmere. These requirements are secured through the extant outline planning permission in various strategy and masterplan documents as well as the section 106 agreement.

95. What amount of custom and self-build, other forms of residential accommodation including for older people is expected?

- 2.30 EDC granted reserved matters approval for 67 custom build units on Alkerden Parcel 7 in 2021 and this scheme is currently under construction with some occupations. Initial discussions have taken place with the landowner about a further parcel of land being developed in a similar way but these discussions have not developed recently so it is unclear if this will be custom build or not.
- 2.31 As identified in the answer to Question 91, a scheme for older persons accommodation is expected in Ashmere for 250 units.

96. Is policy E5 sufficiently clear as to the other social infrastructure that is required to support the planning residential expansion?

2.32 Regard should be had to the answer for Question 93 which relates to all infrastructure including social infrastructure. The extant outline planning permission sets out the

requirements for social infrastructure within the section 106 and associated strategies allowing some flexibility for provision.

Policy E6 - North of London Road Area, Swanscombe

- 97. Is the policy effective in the absence of any clear requirements in terms of square metres of development/use classes? What is the timeframe for the delivery of this allocation?
- 2.33 EDC supports the use of a criteria based policy for this area of Ebbsfleet. There continues to be significant uncertainty over the future of this area but there is potential for regeneration in the area and as an area of brownfield land within Ebbsfleet we expect development proposals to come forward in the Plan period. The criteria appropriately outline applicable issues for schemes that come forward.
- 98. Is policy E6 sufficiently clear as to the forms of development would be acceptable?
- 2.34 The policy supports the regeneration of the area and this is supported by the EDC. Any emerging proposals would also be considered against more strategic policies including Policy E2.
- 99. Criterion 2 indicates that buffers will be created in between developments and the Site of Special Scientific Interest (SSSI). What type of buffers are envisaged?
- 2.35 EDC will work with Natural England on the type of appropriate buffers as schemes come forward in these area.
- 100. Is the policy area extent justified having regard to the location of the SSSI?
- 2.36 The policy area extent reflects the boundaries of the notified SSSI that had been released when the Local Plan was published in September 2021. However the boundaries of the SSSI changed when it was confirmed in November 2021. It is considered that the extent of policy E6 should be increased to include areas which are longer with the SSSI.
- 101. Are any main modification required for soundness having regard to the confirmation of the Swanscombe Peninsular SSSI?
- 2.37 Following the confirmation of the SSSI In November 2021 it is considered that the boundaries of the Policies E4 and E6 should be amended to reflect the confirmed boundary.

Mark Pullin Director of Planning & Place September 2022