

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents - the deposited documents, views and representations received as referred to in the reports and included in the development proposal dossier for each case and also as might be additionally indicated.

Item D1

Proposed realignment and widening of Rathmore Road, Gravesend – GR/2012/0441 (KCC/GR/0148/2012)

A report by Head of Planning Applications Group to Planning Applications Committee on 6 November 2013

Application by Kent County Council Highways and Transportation for improvements to Rathmore Road, Gravesend, including its realignment through the existing car park at the eastern end to a new junction immediately south of 20 Stone Street, widening at the western end involving the demolition of 13 Darnley Road and The Lodge, Rathmore Road, and signalisation of its junctions with Stone Street and Darnley Road; and improvements to the railway station forecourt, including the provision for taxis and disabled parking, Land at and surrounding Rathmore Road south of the Railway, Gravesend – GR/2012/0441 (KCC/GR/0148/2012).

Recommendation: Subject to any further views received by the meeting, including further reactions to noise assessment, permission be granted subject to conditions.

Local Members: Mrs S. Howes and Mr N. S. Thandi

Classification: Unrestricted

Site

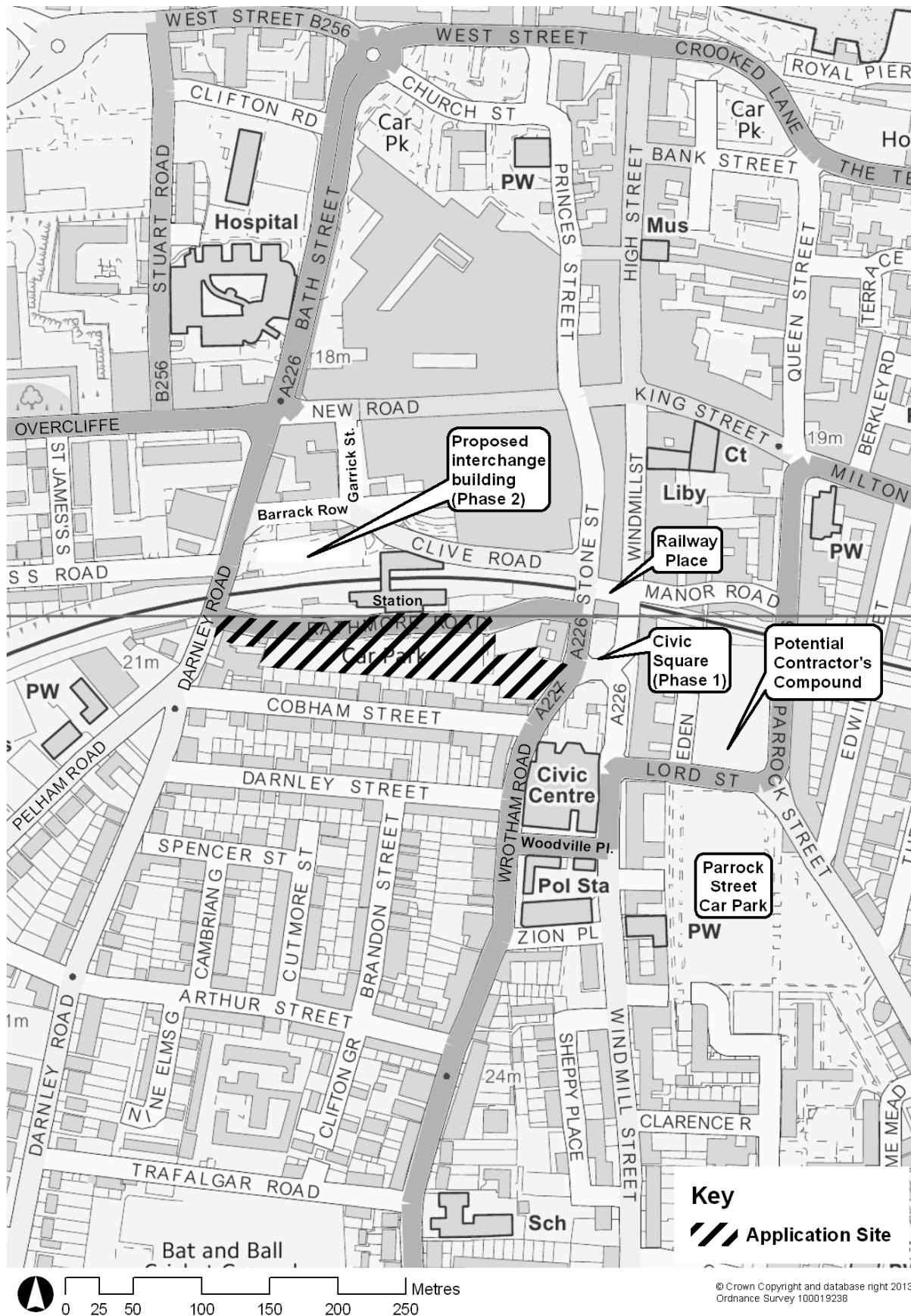
1. The application site lies to the south of Gravesend railway station. It comprises an area of land 0.95 of a hectare which includes Rathmore Road, the public car park of 225 spaces to the south (owned by Gravesend Borough Council), and 13 & 15 Darnley Road and The Lodge, Rathmore Road to the west. Properties in Cobham Street to the south, Darnley Road to the west and Stone Street to the east back onto the site. To the east the application site fronts onto Wrotham Road opposite the Civic Centre. Site location plans are attached.
2. Rathmore Road is a narrow, enclosed, sunken one way street from Darnley Road to the west through to Stone Street to the east that provides access to the south side of Gravesend Station. Along the southern side of Rathmore Road there is a grass bank with a line of hornbeam trees above a stone retaining wall. At either end of Rathmore Road advertising hoardings feature on the walls to the side of No. 13 Darnley Road and Bar 24.
3. The application site is partly within and otherwise adjoins or is close to the Darnley Road and Upper Windmill Street Conservation Areas. Gravesend Railway Station building to the north and numbers 20–24 Stone Street to the east, a small terrace which includes Bar 24, are Grade 2 Listed Buildings.

Background, Relevant Planning History and Proposal

4. This application which was submitted in April 2012 seeks full planning permission for improvements to Rathmore Road, Gravesend that include its realignment through the existing car park at the eastern end to a new junction immediately south of 20 Stone

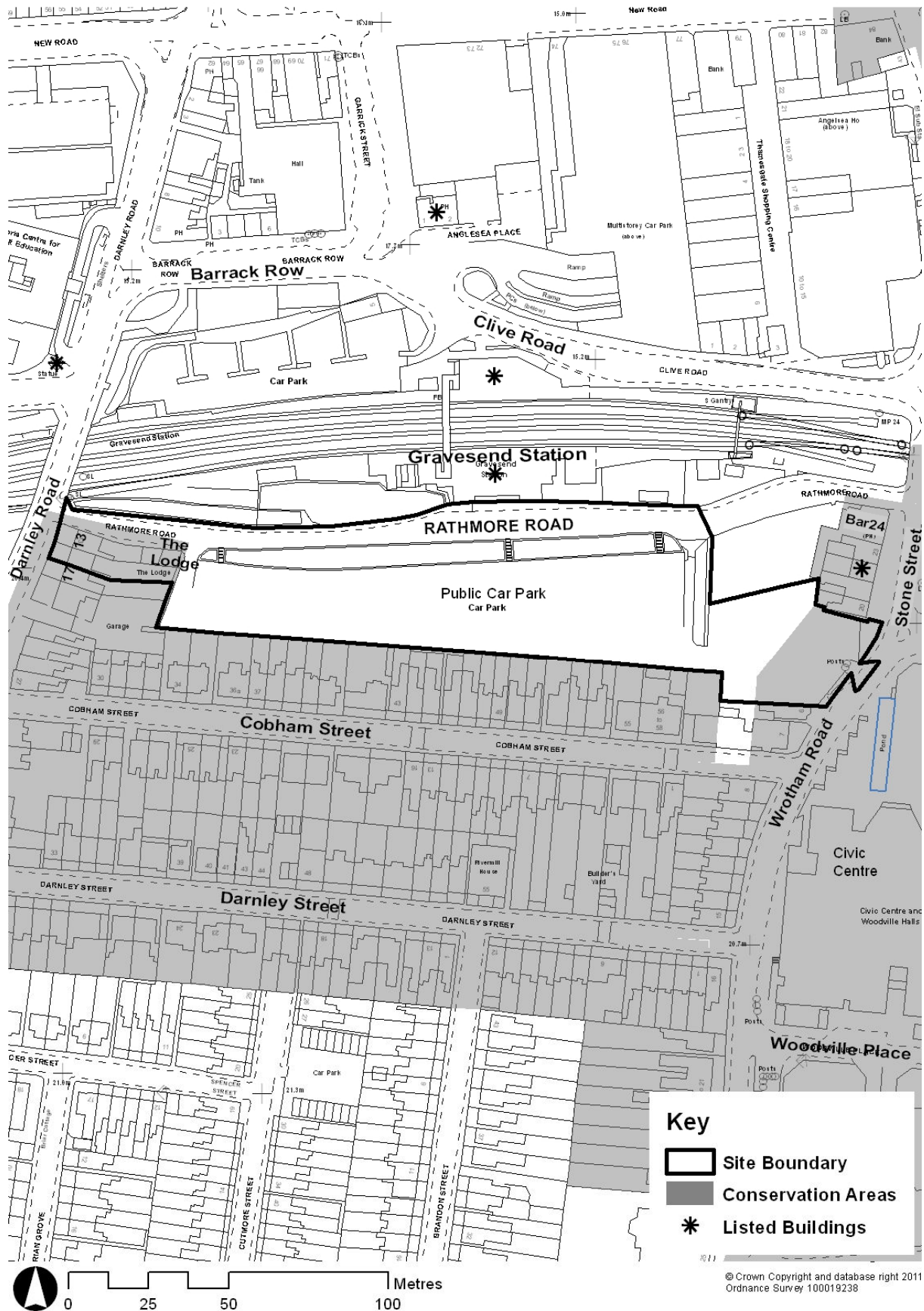
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Site Location Plan



Proposed realignment and widening of Rathmore Road, Gravesend – GR/2012/0441 (KCC/GR/0148/2012)

Site Context Plan



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Background, Relevant Planning History and Proposal *continued*

Street, widening at the western end involving the demolition of 13 Darnley Road and The Lodge, Rathmore Road, and signalisation of its junctions with Stone Street and Darnley Road; and improvements to the railway station forecourt, including the provision for a drop-off/pick up area, and taxis and disabled parking.

5. The proposed development relates to '*The phased implementation of the Gravesend Transport Quarter Master Plan*' which was granted outline planning permission by Gravesham Borough Council in October 2010. That proposal included:
 - (a) Erection of an interchange building providing car park, retail/office units and bus interchange on Barrack Road;
 - (b) Realignment and diversion of Rathmore Road between Wrotham Road and Darnley Road;
 - (c) Erection of residential development on south side of Rathmore Road;
 - (d) Erection of an office development on the west side of Wrotham Road, north of no.6 with maximum floor space of 234 square metres; and
 - (e) Ancillary streetscape, junction and transport interchange improvements including creation of new pedestrianised civic square between Civic Centre and Sensory Gardens.

The outline permission expired on the 21 October 2013 and is subject of a renewal application to the Borough Council.

6. The aim of the Gravesend Transport Quarter Development is to create a major gateway for Gravesend with a transport interchange that integrates the railway station with the town centre and with bus (including *FASTRACK*) and taxi services by rationalising traffic movements and improving pedestrian linkages.
7. The intention is that the Master Plan be implemented in phases. Phase 1 included the creation of the Civic Square which was completed in November 2011.
8. The erection of an interchange building providing a car park with 396 car parking spaces, retail/office units and bus interchange on Barrack Row is identified as Phase 2. The application for approval of reserved matters for this submitted on behalf of Network Rail pursuant to the outline permission was approved by Gravesham Borough Council in July 2011. As no construction commenced the approval expired in July 2013.
9. The development subject of this planning application, for the realignment and widening of Rathmore Road and related works, has been identified as Phase 3, of which it is stated in the application not to be dependent upon Phase 2 being completed. The proposed realignment is effectively a 250m length of new carriageway that connects the northern part of Wrotham Road (before it turns into Stone Street) and Darnley Road. It bisects the existing Rathmore Road car park, and connects halfway along the existing Rathmore Road, immediately adjacent to the railway station entrance. The realignment, facilitated by the demolition of No. 13 Darnley Road and 'The Lodge', would create approximately 2000m² of additional road space and enable the new Rathmore Road to carry two-way traffic, giving greater flexibility for vehicle movements around this part of the town centre. It would provide an alternative through route into the town centre and enable Clive Road to exclusively carry buses, local delivery vehicles and traffic to and from the existing (and proposed) car parks. The route from Clive Road to Darnley Road via Barrack Row would be for buses only. The applicant states that the realignment provides the most direct route possible between Wrotham Road and Darnley Road,

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designed to ensure minimal disruption to existing, neighbouring residential and commercial boundaries.

10. An application for Conservation Area Consent for the demolition of 13 Darnley Road, The Lodge, Rathmore Road and front and rear boundary walls of 15 Darnley Road was consented by Gravesham Borough Council in January 2011 and expires in January 2014. A condition of the consent is that the demolition shall not commence until such time as a contract is let for the construction for the realignment of Rathmore Road.
11. In addition to the demolitions necessitated by this proposal, 22 trees would need to be removed. The construction of the road would also involve the creation of a cut in slope on the south side, as a result of the varied levels across the application site. A 2.4 metre high timber acoustic barrier would be erected at the top of this slope, in order to mitigate the impact of traffic noise that would be experienced at properties in Cobham Street to the south. It is proposed that the impermeable surface of the car park unaffected by the construction of the road would remain in place. Access to this area at the western end would be retained through a gated entrance in the acoustic barrier for maintenance purposes. Existing drainage features would be re-used wherever possible and the runoff would continue to drain either to soak-away or the public sewer. The realignment of the road would provide additional space in front of the railway station with circulation for drop-off and pick up, an area for taxis and disabled parking. To the rear boundary of 'Bar 24' in Stone Street, to the east and adjoining the footway behind the proposed disabled parking, the construction of a retaining wall would be required. Landscape proposals include appropriate replacement planting and enhanced paving materials consistent with the wider Gravesend Transport Quarter Scheme. Proposals for street lighting include 8 metre columns along the road and footways, and 10 metre columns outside the station.
12. A section of the existing Rathmore Road would remain to the east. A lay-by would be provided for deliveries but it would otherwise become an enhanced pedestrian route to and from the station from the eastern end of the town centre. Streetscape improvements would be carried out to this part of Rathmore Road together with Darnley Road, Clive Road, Stone Street, Railway Place as part of Phase 3 under permitted development rights.
13. The applicant has indicated a potential contractor's compound on land immediately north of Lord Street between Eden Place and Parrock Street. This is shown on the location plan on page D1.2. However this does not form part of the application and is for information only.
14. The applicant states that the new Rathmore Road alignment would enable an area of land for possible future development, situated between the new Rathmore Road and the rear of the Cobham Street properties, identified as Phase 4. This land has outline permission for residential and retail/office development as indicated in paragraph 5(c) and (d) above.
15. Although proposals for a scheme to widen and realign Rathmore Road benefit from outline permission, as referred to in paragraph 5 (b) above, a fresh application has been submitted, rather than an application for approval of reserved matters. That is partly as a result of some changes that have been made to the scheme but also because the development is to be carried out by (or on behalf of) the County Council as Highway Authority and therefore falls to be determined by the County Planning Authority. The applicant advises that these changes include the following:

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- The retaining wall, associated with the proposed future development, that extended along the longer part of the south side of the scheme has been removed and replaced with a cutting slope.
 - The layout to the station forecourt has been amended.
 - The materials to the station forecourt have been amended.
 - Details of the retaining wall required at the rear of Bar24, Stone Street have been provided.
 - The alignment of the new Rathmore Road has been updated
 - Lighting details have changed.
 - The acoustic barrier has been added.
 - The soft landscape proposals have been amended.
16. As well as a Planning Application Report and a Design and Access Statement, the application as originally submitted was accompanied by an Air Quality Assessment, Tree Survey/Arboricultural Report, and Ecological Scoping Report, and a Bat Survey, Desk Study Report which assesses potential contaminated land, geotechnical and construction issues, Heritage Statement, Townscape and Visual Impact Assessment, Noise and Vibration Impact Assessment, Draft Site Waste Management Plan, Flood Risk Assessment, and the Design and Access and Planning Statements from the Outline Application. Amongst other matters the Planning Statement makes reference to and summarises the main findings of the Transport Assessment submitted with the outline application, but that was not submitted with this application.
17. A Screening Opinion was adopted by the County Planning Authority on the 14 May 2012 following receipt of the application concluding that Environmental Impact Assessment is not required and therefore that the application did not need to be accompanied by an Environmental Statement.

Additional/Amended documents

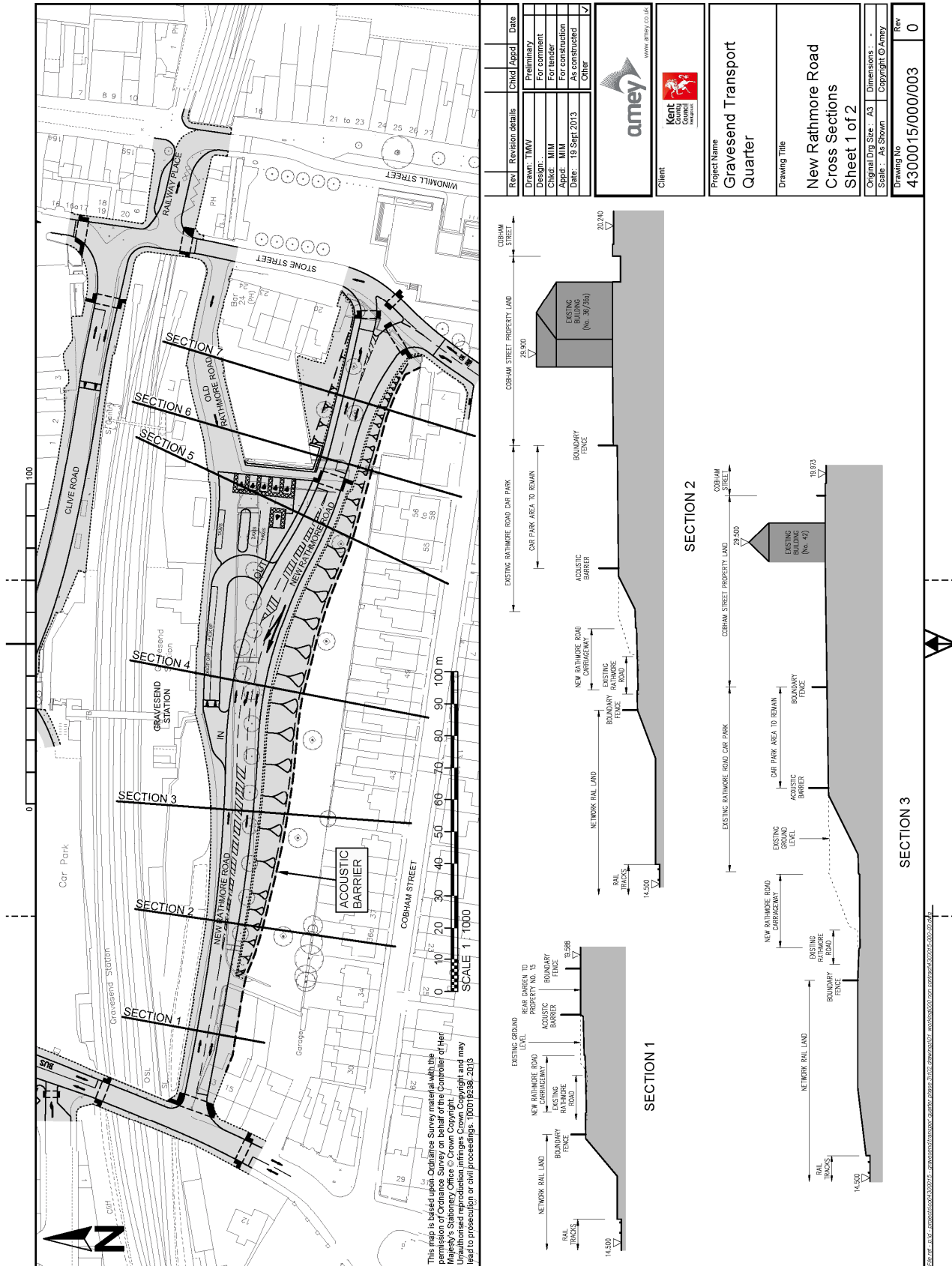
18. The Transport Assessment, Noise and Vibration Assessment and Air Quality Assessment referred to above were carried out to reflect that the Rathmore Road widening and realignment would not be carried out until the transport interchange building had been constructed. However a number of consultee responses and representations received highlighted that the effects of Phase 3 being implemented in advance of Phase 2 happening had not been assessed. The applicant has now addressed that possibility by the submission of additional/amended details indicating that Network rail are unlikely to commence construction of the Interchange building for sometime, and as noted above the approval has now expired. The amended/additional details (received at the end of August 2013) include:
- A revised scheme plan (as attached) which shows amendments to the permitted development area at Clive Road bus gate which is now shown just connecting into existing Barrack Road. Additionally, the previously submitted plan included proposed layout alterations to Barrack Row to coincide with the proposed Phase 2 layout and these have now been removed from the drawing;
 - Transport Assessment Report June 2013 which excludes the effects resulting from Phase 2;
 - Noise and Vibration Assessment March 2013 to reflect the revised traffic effects; and
 - Air Quality Assessment March 2013 to reflect the revised traffic effects.

Reduced copies of the drawings showing the proposed road layout, sections through the road, and elevations of 13 and 15 Darnley Road are attached.

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Cross Sections 1 to 3

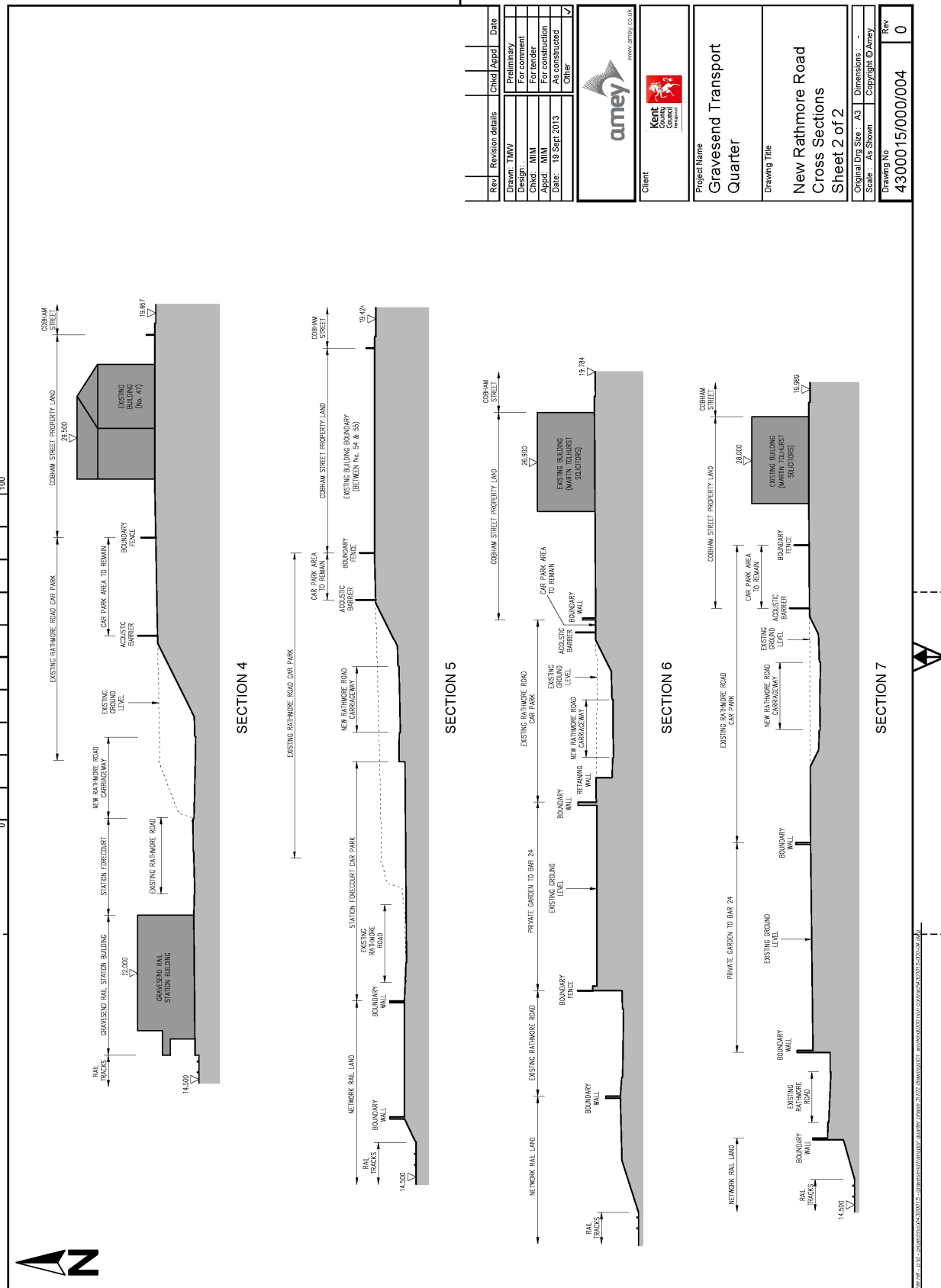


Rev	Revision details	Chkd	Appd	Date
1	Drawn: TMW			
2	Design: For comment			
3	Chkd: MIM			
4	Appd: MIM			
5	Date: 19 Sept 2013			
6	For construction			
7	As constructed			
8	Other			

amey	www.amey.co.uk
Client	Kent County Council
Project Name	Gravesend Transport Quarter
Drawing Title	New Rathmore Road Cross Sections Sheet 1 of 2
Original Dwg Size	A3
Scale	As Shown
Dimensions	Copyright © Amey
Drawing No	4300015/000/003
Rev	0

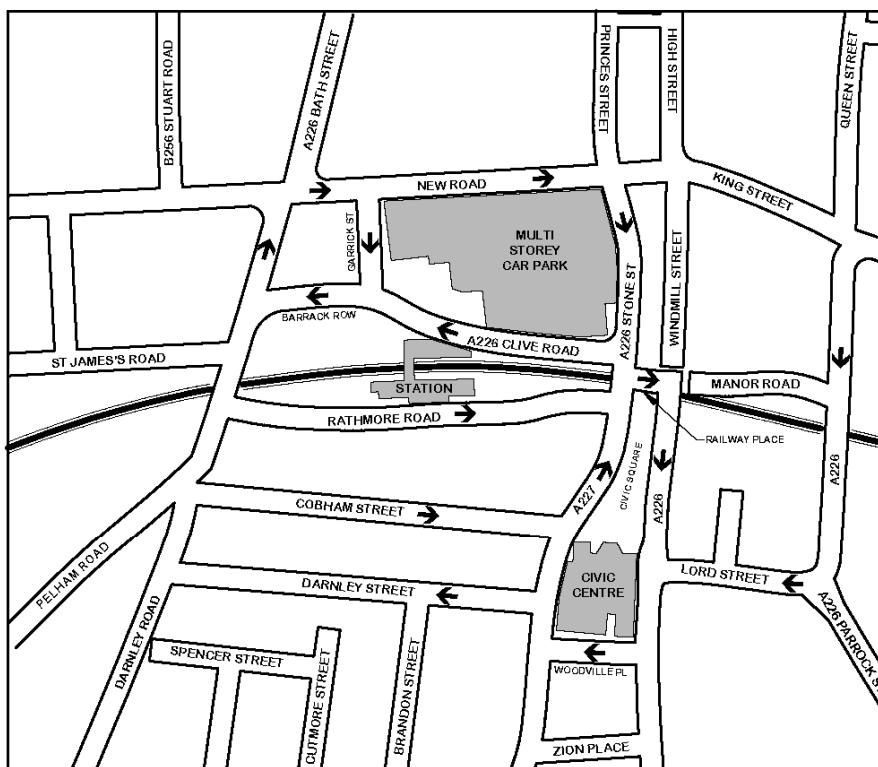
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Cross Sections 4 to 7

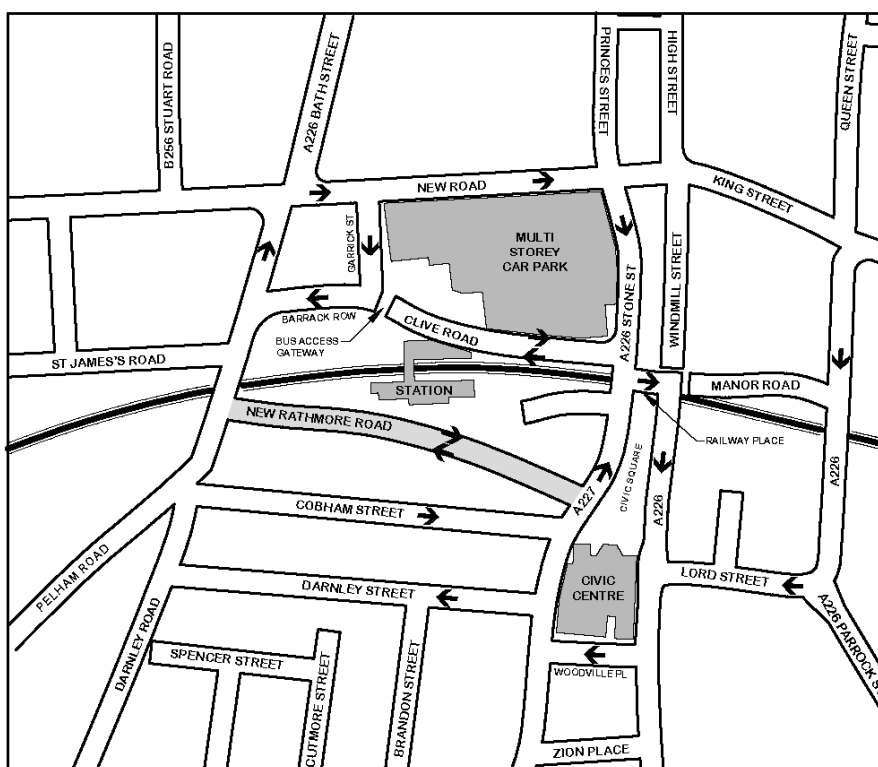


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**Proposed realignment and widening of Rathmore Road, Gravesend –
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EXISTING ROAD LAYOUT



PROPOSED ROAD LAYOUT

Proposed realignment and widening of Rathmore Road, Gravesend – GR/2012/0441 (KCC/GR/0148/2012)

Planning Policy

19. The following National Planning Policy guidance, Development Plan Policies and emerging Development Plan Policies summarised below are relevant to the consideration of the application:

- (i) **National Planning Policy (NPPF) March 2012:** The NPPF sets out the Government's planning policy guidance for England at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

Decision-takers may also give weight to relevant policies in emerging plans according to: the stage of preparation of the emerging plan; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework.

In determining applications the NPPF states that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- The great importance the Government attaches to the design of the built environment, recognising that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- The need to ensure that flood risk is not increased elsewhere.
- The aim to conserve and enhance biodiversity.
- The need to prevent unacceptable risks from pollution and land instability.
- The aim to avoid noise from giving rise to significant adverse impacts on health and quality of life, and mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development.
- The need to ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- The need to limit the impact of light pollution from artificial light on local amenity by encouraging good design.
- The need to consider the significance of any heritage assets affected, including any contribution made by their setting, and consideration of any harm or loss arising from the impact of the proposed development. Also, to take into account the relative significance of loss of any building or other element affected and its contribution to the significance of a conservation area as a whole. In considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the conservation of the asset.

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- (ii) The adopted **Gravesham Borough Local Plan First Review 1994** (relevant saved policies). *Some of these saved policies will be replaced in whole or in part by policies in the Gravesham Local Plan Core Strategy once adopted as indicated in brackets.*

- Policy TC0** Gives priority to conserving and enhancing the built environment, with particular importance attached to (amongst other things) the design of new development, the safeguarding and enhancing of conservation areas and environmental improvement schemes.
[Will be replaced by: CS12 Green Infrastructure, CS19 - Development and Design Principles, and CS20 - Heritage and the Historic Environment.]
- Policy TC2** Sets out the approach for development affecting listed buildings including their setting, the primary consideration being the maintenance of the integrity of the original listed building.
- Policy TC3** Where development proposals are acceptable in relation to other policies their impact on conservation areas will be carefully judged and they will be expected to make a positive contribution to the conservation area. Demolition of unlisted buildings within conservation areas will be resisted unless the Borough Council is satisfied that the existing building is harmful to the conservation area and that the redevelopment or other use of the site will be beneficial.
- Policy TC5** Seeks to promote the identification, recording, protection and enhancement of archaeological sites.
[Will be replaced by: CS09 Culture and Tourism and CS20 - Heritage and the Historic Environment.]
- Policy TC10** Seeks adequate landscaping for new development and protection of important trees and woodlands, other important landscape features and habitats of nature conservation value.
[Will be replaced by: CS12 Green Infrastructure and CS19 - Development and Design Principles.]
- Policy T0** Seeks to achieve the most effective use of the existing highway network and the promotion of new or improved roads for the benefits of residents and to facilitate development opportunities in the Borough, better facilities for public transport users, pedestrians and cyclists, and highway safety and environmental improvement measures for the benefit of all transport users and residents of the Borough. *[Will be replaced by: CS11 – Transport.]*
- Policy P1** Seeks to maintain an adequate supply of publicly controlled off-street parking spaces with Central Gravesend. *[Will be replaced by: CS11 – Transport.]*

- (iii) Whilst the **Gravesham Local Plan Second Review (Deposit Version) 2000** was adopted as a material consideration for development control purposes, little regard should now be paid to the policies within it given the publication of the emerging Gravesham Local Plan Core Strategy and the National Planning Policy Framework. They are therefore not listed or referred to.

- (iv) **Gravesham Local Plan Core Strategy:** Public consultation for the Local Plan Core Strategy – *Proposed Submission Version December 2012* ended at the end of February 2013. Submission for Examination by an Independent Inspector took place in May 2013, and the Public Examination Hearing took place between 10 and 18 September. On the 23 September the Inspector gave a preliminary view on the

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soundness of the Core Strategy, in particular raising concerns about the proposed total new housing provision and annual delivery rate over the plan period. As a result the Borough Council has now agreed to undertake further work as advised by the Inspector in accordance with a provisional timetable to address these concerns and to enable the Core Strategy to be adopted as quickly as possible. That is currently indicated to be August 2014.

A Site Allocations and Development Management Policies Development Plan Document will be prepared following the adoption of the Core Strategy.

The most relevant policies from the Core Strategy - Proposed Submission Version December 2012 (as proposed to be amended May 2013) are as follows:

Policy CS01 Sustainable Development - States that a positive approach will be taken which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in the Core Strategy.

Policy CS05 Gravesend Town Centre Opportunity Area - The Area will be the principal focus for town centre related economic and social activity in the Borough. This will be achieved by, amongst others, improving its role as a transport hub by the creation of a public transport interchange. Within the Opportunity Area, the Council will (amongst other things):

- Seek to improve pedestrian access between the town centre, the River Thames and surrounding areas and reduce the physical barriers created by the one-way system;
- Manage traffic accessing and passing through the area through its approach towards the provision and distribution of public car parks; and
- Support improved public transport access, including the provision of an integrated transport interchange at Garrick Street/Barrack Row.

Policy CS11 Transport - proposals will be supported which improve public transport provision and facilities in the Borough; including, the development of transport hubs at Gravesend Town Centre [and Ebbsfleet] to provide high quality interchange facilities between bus, rail, walking and cycling, and an adequate supply of public car parking will be ensured. Improvements will also be sought to walking and cycling facilities and networks in the Borough to provide improved access to Gravesend Town Centre [and Ebbsfleet] and to other services and facilities in the Borough.

Policy CS12 Green Infrastructure – Amongst other things seeks to protect, conserve and enhance biodiversity, habitats and species.

Policy CS19 Development and Design Principles – Sets out criteria for new development, that includes (amongst other things) the need to avoid causing harm to the amenity of neighbouring occupants, including loss of privacy, daylight and sunlight, and avoid adverse environmental impacts in terms of noise, air, light and groundwater pollution and land contamination; designed and constructed so that it does not pose an unacceptable risk or harm to the water environment; and details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that

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public realm and open spaces are well planned, appropriately detailed and maintained so they endure.

Policy CS20 Heritage and the Historic Environment - Accords a high priority towards the preservation, protection and enhancement of heritage and the historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Consultations

20. **Gravesham Borough Council** made the following comments about the proposal as originally submitted:

"Although submitted under Regulation 3 as a stand alone application this proposal is giving effect to the outline approved Transport Quarter Master Plan and the works to realign Rathmore Road which form part of the ongoing delivery of this wider vision. With the Phase 1 work having been carried out and the Phase 2 interchange/car park in the hands of Network Rail for delivery following detailed approval last July, the Rathmore Road proposal moves towards completing the elements of the jig-saw. It follows that GBC continues to provide clear support for this framework of phased developments and the overarching aspirations of promoting public transport links and improving connectivity within the Town, within which the current proposal forms a key component. In addition, the continuing regeneration and financial investment in the Town Centre through this project is welcomed and supported by the Borough Council's Economic Development team.

Whilst there remains strong support for the principle of the development proposed, it is important to scrutinise the scheme to ensure that the details are acceptable and complement the existing and planned Transport Quarter Master Plan.

Firstly, having received input from the Borough Council's environmental health officers on noise, vibration and air quality, the findings of the technical reports are accepted. However, should these works precede delivery of the approved transport interchange (Phase 2), in order to better understand potential environmental and traffic impacts, consideration should be given to undertaking a traffic assessment that considers this proposal independently.

It is important that the identified air quality impact on the residential premises at 15 Darnley Road is suitably mitigated and it is necessary for an appropriately worded planning condition to be imposed on any permission to require this. As the suggested mitigation measures require planning permission in their own right there may be benefit in submission of a planning application for the works in parallel with the main application. Alternatively, through an informative, it should be made clear that the recommended mitigation would require planning permission.

Also, consideration should be given to the need for a safety audit, with particular reference to pedestrians, to assess the re-routed traffic flows (especially of HGVs) through Railway Place and Windmill Street adjacent to Community Square.

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Adverse noise and air quality impacts that may be experienced during the construction phase should be controlled through compliance with an approved Code of Construction Practice and Environmental Management Plan and this should be required through imposition of a planning condition, to be agreed with the LPA.

In respect of land contamination, the LPA are of the opinion that further details should be provided to support the applicant's conclusion that no mitigation is required to ensure no adverse risk to human health is introduced from potentially contaminated land. Should such information be made available by the applicant the Borough Council would welcome an opportunity to comment further.

In townscape terms the scheme provides an opportunity for improving the setting of the Grade II Listed railway station building by creating a more attractive and welcoming forecourt and the high quality surface materials proposed in its vicinity, to reflect those used on Community Square, are positive. The LPA is though of the opinion that the use of black macadam for the inset parking area and taxi rank may detract from the quality of the space and reduce its perception of being a pedestrian friendly area. The LPA would welcome input into any discussions concerning the potential for alternative surface material for this area.

However, the proposal to enhance the 'old' section of Rathmore Road is positive as providing a mainly pedestrian connection to and from the Town Centre in a manner consistent with the first phase of the Transport Quarter Master Plan at Community Square. In resolving the necessity and siting of street furniture care should be taken to avoid street clutter, particularly for the partially sighted. Although outside of the application boundary it is considered necessary to build in a safeguard through planning condition for its delivery and enhancement (i.e. soft and hard landscaping) in a timely manner.

Similarly, it is important that adequate assurances are provided by the applicant to confirm that all the relevant highway infrastructure and public realm improvements will be provided to integrate the scheme into the existing highway network and complement the wider aspirations of the Transport Quarter Master Plan.

In order to ensure the sensitive siting of lighting columns in direct proximity to the listed station building, the LPA would request that their exact locations be confirmed through planning condition, to include a detailed plan and elevation. As an aside, consideration ought to be given to the possibility of salvaging the existing 'heritage' style lighting columns along Rathmore Road which will become redundant following installation of the new modern lighting columns as part of this scheme.

The erection of a 2.4 metre high acoustic fence running along the crest of the grassed bank to the south of the new Rathmore Road as proposed, whilst necessary to deal with noise issues, raises concern as representing an unsatisfactory design solution to mitigate vehicle noise. It is the opinion of the LPA that the visual impact of the acoustic barrier could be improved and options for either alternative designs and/or softening of its stark appearance should be considered, to include landscaping of the grassed bank.

Whilst KCC Planning will seek advice from their own archaeological officer on such matters, it is prudent for the LPA to draw attention to the conclusion of a 2008 report by Oxford Archaeology which highlighted the area to the south of Rathmore Road has potential to contain intact archaeology.

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Next, whilst it is not the responsibility of this development proposal to design a scheme for the residual land of Rathmore Road car park, as the road works fall within the 'framework' of the approved Transport Quarter Master Plan that seeks to utilise this land for development, it would seem necessary and reasonable for it to consider how access to the site may be provided in the context of the current scheme. Despite the presence of an acoustic fence the application confirms that access will be retained at the existing car park entrance, albeit not for use by the general public. This would appear to be sufficient to ensure the highway design does not impose any significant constraints for the future use of this land for any reasonable town centre use, such as a residential developed envisaged through the Master Plan. It is accepted that the merits and impacts of any such future development, such as on townscape and residential amenity, would stand to be assessed at that time and subject to the proposal.

Finally, the impact of the proposal upon Town Centre public car parking is a relevant planning consideration and it is noted that the current scheme, as a stand alone project, will result in the loss of existing car parking spaces. However, as land owner of the car park, this is a matter for GBC to consider through land transfer/sale negotiations."

The Borough Council has made the following further comments in the light of the additional/amended details received and applicant's response to the matters raised above:

"It is noted that the proposed scheme remains largely unaltered from that previously submitted, with the exception of modest highway works to tie in to the existing road network, rather than to the layout proposed to accommodate the interchange building. It is positive that the applicant has reaffirmed a commitment to deliver this scheme within the context of the overall Gravesend Transport Quarter Master Plan, which provides comfort that details such as surface treatments and street paraphernalia will be consistent with and complement the works already carried under Phase 1 of that project.

Gravesham Borough Council would not wish to add any further comment in respect of the traffic implications of the proposed scheme as the updated Transport Assessment (TA) will be comprehensively reviewed and commented on by KCC Highway and Transportation. It is however noted that, whilst the TA mentions that the existing bus stops in Clive Road will be relocated to form part of a new transport interchange at Barrack Row and Garrick Street, the revised Scheme Plan includes no such annotation – this would be useful to give a clear picture of what is being proposed in the round.

A principal comment provided previously raised some concern with the approach to noise mitigation by the erection of a 2.4 metre high acoustic fence running along the crest of the grassed bank on Rathmore Road. It is noted that the applicant has confirmed that a landscaping scheme will be developed to soften the visual impact of this barrier, and GBC would expect details of the soft landscaping, and the barrier itself, to be reserved through planning condition.

In townscape and heritage terms, it is suggested that it would be more appropriate for the gable wall to 15 Darnley Road to be finished in yellow stock brick to match the original and not rendered and the existing advertising hoarding should not be replaced on the flank wall due to being harmful to the character and appearance of the Darnley Road Conservation Area. Likewise careful consideration should be given to the rear boundaries of 20-24 Stone Street, which will become prominent components of the conservation area as a result of the proposals.

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In respect of the street lighting columns, the applicant has explained that their precise locations will be determined having regard to factors such as spread of lighting, location of utilities and adjacent buildings. The principal purpose for raising this matter initially was to ensure that the lighting columns are sensitively sited when viewed against the backdrop of the Listed station building. This relationship should be a factor taken into account when finalising the precise location of the columns.

Turning to environmental matters, it is acknowledged that the applicant will undertake further intrusive investigation with a view to suitably remediating any contamination prior to the commencement of works, which will presumably be required through planning condition.

Next, in respect of the updated noise and vibration report, this has been considered by GBC's Senior EHO and the conclusions of that report are accepted. It has however been noted that noise impacts on the occupied flats at 23 and 24 Stone Street don't appear to have been considered but, in any case, it would appear likely that relocating the road away from these premises as proposed should only improve noise conditions experienced by these residents. Also, the updated assessment notes that the impact on 6A Wrotham Road and 2 Cobham Street is reduced from the earlier assessment.

Further to previous comments recommending the approval of a Code of Construction Practice, it is suggested further that the contractor enters into an agreement under section 61 of the Control of Pollution Act 1974 as the best way to deal with construction noise. I understand that the contractor, Amey, has already informally discussed this approach with GBC's Senior EHO.

In respect of air quality, the findings of the latest assessment are accepted by GBC. This assessment identifies that the adverse air quality impacts of the scheme will be extended to include 17 Darnley Road and 58 Cobham Street (as well as 15 Darnley Road previously identified) so, accordingly, it is important that such effects are suitably mitigated. Whilst the applicant has accepted that a planning condition to mitigate the effects on 15 Darnley Road (which they intend to purchase and thus have control over) would not be opposed, such a mechanism would not provide a similar safeguard for the other two affected properties that, since the applicant has not indicated an intention to acquire, would remain in third party ownership. It is recommended that the applicant be requested to provide details of a mechanism that will ensure air quality exceedences at these locations are adequately mitigated. It is however advised, to more accurately inform the air quality assessment process, that the applicant carries out some monitoring at the above two locations, particularly since the exceedence at 58 Cobham Street is only marginal and actual monitoring (rather than predictions) may assist to resolve the matter."

Environment Agency has no objection in principle and considers that planning permission could be granted to the proposed development as submitted subject to conditions to control potential contamination not previously identified and infiltration of surface water drainage into the ground, to ensure protection of the underlying aquifer. The Environment Agency considers that without these conditions the proposed development would pose an unacceptable risk to the environment and would object to the application.

English Heritage raises no objection to the proposed development subject to the following comments:

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“Although the demolition of 13 Darnley Road is to be regretted, as it is a good example of a mid-nineteenth century terraced house that is in good condition, English Heritage has previously indicated its acceptance of its loss on the basis of the wider benefits that the Transport Quarter will bring to Gravesend town centre. It suggests that conditions are attached to any planning permission to require the full recording of the building prior to demolition and for salvaging of interior and exterior architectural features and elements and, if possible, their incorporation into adjacent buildings in the terrace.”

English Heritage urges that the above issues be addressed and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of our specialist conservation advice.

Network Rail no views received.

KCC Highways and Transportation - Development Planning Manager initial views were as follows:

Noted that the submission relied on the previous acceptance of the Transport Assessment produced in support of the Outline Transport Quarter proposals within which certain assumptions were made including the delivery of the Transport Interchange building and associated multi-storey car park facility in advance of the Rathmore Road highway alterations. Also, that no assessment had been made of the potential traffic and parking impact of implementing the scheme in advance of the delivery of the Transport Interchange building and therefore strongly recommended that this be addressed - either by the submission of further supporting information addressing these issues or by the conditioning of any permission to prevent commencement of works until such time as the Phase 2 Transport Interchange and multi-story car park is operational.

Other detailed issues were raised as follows:

- Clarification on how cyclists travelling from St. James' Road via Darnley Road to the station entrance in Rathmore Road would be accommodated within the proposed arrangement.
- How the proposed drop-off parking area in front of the station on the north side of Rathmore Road interacts with the proposed service road which follows the previous alignment of the eastern end of Rathmore Road - particularly with regard to highway adoption areas and the demarcation of such areas.

It was also noted that the proposed highway scheme had been designed to integrate with the completed Phase 2 Transport Quarter scheme which includes a certain amount of off-site highway works which would potentially not be in place should the scheme be implemented in advance of Phase 2. Commented that whilst this could most likely be accommodated by design, recommended that a review of the design be carried out at any location where the proposal would need to tie into an area of the public highway which would alter as a result of the non-implementation of Phase 2 to ensure that either scenario (i.e. with or without Phase 2 in place) could be accommodated.

Following receipt of the additional/amended details and a response from the applicant to the detailed points above has commented as follows:

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“Initially it should be noted that this detailed proposal represents Phase 3 of an outline planning proposal (the Transport Quarter development) which was previously granted planning approval by Gravesend Borough Council as the Planning Authority with no objection in principle having been raised by the Highway Authority, Kent County Council in respect of the overall highway impact of that Outline scheme.

The initial submission of details in respect of this particular phase of work generated a number of highway related issues and points of clarification as a result of the potential progression of the Phase 3 works ahead of the previously approved Phase 2 works. However, I am satisfied that the revised detailed proposals and updated Transport Assessment either directly address those outstanding highway issues or clarify the way in which they will be dealt with through the detailed approval process for the highway improvements scheme and accordingly, there are no further highway objections raised in respect of these proposals.”

KCC’s Noise Adviser commenting on the March 2013 Noise and Vibration Assessment has noted that although control measures are included within the Assessment, it is not possible to determine whether significant disturbance would be caused to neighbouring receptors during construction. It has therefore been requested that predictions of noise and vibration from each phase of the proposed construction works should be provided in order to enable the impact of construction noise to be properly assessed. With regard to operational impacts it has been requested that the following matters be addressed and information provided in order to establish whether the conclusions of the Assessment are reliable:

- A description of the road project objectives in relation to noise and vibration.
- Define and display the study area, and the main sources of noise and vibration in the area.
- A list of predicted noise levels at all sensitive receptors used in the assessment, including the associated magnitude of change.
- The results from the relevant Basic Noise Level comparisons.
- Any possible cumulative impacts.
- Noise change contour maps.

The applicant has now addressed these matters in an addendum as referred to in paragraph (50) of the discussion section of the report.

KCC’s Air Quality Adviser has commented on the March 2013 Air Quality Assessment as follows:

Construction Phase

“There is no mention of earthworks or trackout activities in the construction impact assessment and that if these parameters are not yet known, worst-case assumptions should be made for a conservative assessment.

Although dust emissions classes and the significance of the effect with mitigation are given for demolition and construction, no risk category or significance of the effect without mitigation is given. It would be useful if the risk categories and the significance of effects without mitigation were highlighted.”

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Operational Phase

“A value of 0.5 has been used in the model for surface roughness, to represent parkland and open suburbia. Sensitivity analysis using a value of 1 for surface roughness should be used to represent an urban built-up area.

The year chosen for emission factors is not clear. If 2014 emission factors were used, the predicted concentrations are considered to be under-predicted. The year chosen for emission factors should be stated. For a more conservative assessment, the base year 2010 should be used to calculate emissions factors.

There is a “neutral effect” stated overall upon Air Quality Management Areas and it is therefore considered to not be an over-riding planning consideration. As one new exceedance of air quality objectives is generated as a result of the scheme within a declared AQMA, mitigation measures need to be identified.

Mitigation methods have been recommended to reduce the impact of the development upon certain areas and to prevent a new AQMA being designated. The recommended mitigation method should be captured within a planning condition.

Contour plots should be included.”

The applicant has now addressed these matters in an addendum as referred to in paragraph (60) of the discussion section of the report.

The County Council’s Biodiversity Officer is satisfied that there has been adequate consideration of the potential for ecological impacts as a result of the proposed development and notes that there is limited potential for ecological impacts beyond the potential for the presence of breeding birds. Therefore advises that the implementation of the mitigation measures in the Ecology Scoping Report, which state that “*if trees and buildings cannot be removed outside of the bird breeding season, an inspection by a qualified ecologist must first be completed within 48hrs of the works commencing*” must be carried out prior to such works commencing.

In addition advises that, in keeping with the National Planning Policy Framework (NPPF), “*opportunities to incorporate biodiversity in and around development*” should be encouraged. Therefore the recommendations in section 4.5 of the Ecology Scoping Report to use native species planting and bird nest boxes in the landscape proposals must be implemented to ensure compliance with the NPPF.

The County Council’s Conservation Architect has commented as follows:

“Setting of the Conservation Area

Opportunities should be sought to preserve and enhance the Conservation Area in line with English Heritage guidance. To this end one would anticipate that consideration is given to materials and street lighting that reflect the historic setting of the conservation area. Signage and road markings should also respond sympathetically to the setting of the conservation area.

Setting of Historic & Listed Buildings

Opportunities should be sought to ensure enhancement of the setting of listed buildings in the area. The setting of the railway station would benefit from an upgraded forecourt adopting materials appropriate to the historic setting of the listed building. Likewise careful consideration should be given to the rear boundaries of 20-24 Stone Street,

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which would become prominent components of the Conservation Area as a result of the proposals. Visually linking the newly completed Civic Centre Forecourt with the Railway Station Forecourt, by considering the design and materials would contribute to the enhancement of the town centre and the Conservation Area. The gable wall to 15 Darnley Road should be finished in yellow stock brick to match the original and not rendered. Advertising hoardings should be removed.

Boundary Treatment

The impact of boundary treatment adjacent to the proposal is fundamental to the setting of the major arrival point for the town centre, the listed buildings and the Conservation Area. The proposed acoustic panels will detract from the environment around the railway station and detract from the setting of the Conservation Area and the listed buildings. Further design is necessary to develop acoustic walls that are more in keeping with the historic town centre. The use of yellow stock brick walls, which are more in keeping with the listed buildings and the conservation area, should be developed and adopted to address sound attenuation requirements. These can be constructed at back edge of pavements and terraced up the gradient of the slope along the new road as necessary to incorporate landscaping.”

The County Council’s Archaeological Officer has commented as follows:

“There is potential for archaeological remains to survive within this development site but there is likely to have been some disturbance from post medieval construction, especially associated with the development of the railway. Undisturbed archaeology could survive in pockets although the area around Rathmore Road seems to have a strip of land, earlier allotments, which has high potential for archaeology. There are listed historic buildings within close proximity of this development and there may be local heritage sites which need careful consideration, especially the location of WWII civil defence sites.

There are a few key sites which will merit particular consideration in terms of heritage issues. The developments around Rathmore Road have potential to have an impact on extensive undisturbed buried archaeology.

There is nothing as yet recorded in this area of the application site but there is potential for prehistoric and Roman remains to survive as well as medieval remains. Developments within the area around the proposed Interchange Building may have an impact on buried archaeology although much of this area has been truncated by railway excavations. Proposals towards the east of Rathmore Road, towards Wrotham Road may have an impact on buried archaeology.

Although some of the proposed works are superficial, such as landscaping and improvements to the railway station forecourt, recently archaeological work for the Phase One, Civic Centre area has clarified that unrecorded archaeological remains can survive fairly close to the surface.

Finally, I would like to encourage utilisation of the wonderful heritage of Gravesend in the design of landscaping and improvement works to the highways within the Transport Quarter development. There needs to be consultation with the District Conservation Officer to ensure the settings of Listed Buildings and recognised historic buildings are not detrimentally affected and where possible enhanced. In addition, there are several WWI and WWII heritage sites in this area and this major regeneration of the Transport

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Quarter presents an opportunity to provide visible signs of the military and civil defence heritage of Gravesend.

This application is supported by a Heritage Statement by Jacobs. This report is fine and provides reasonable baseline assessment of the heritage issues. Archaeology is also mentioned in paragraphs 9.17 and 9.18 of the Gravesend Transport Quarter Master Plan Planning Statement.

I have no major comments to make on the supporting documents but would like to encourage consideration of early archaeological evaluation works; greater consideration of preservation in situ of important buried archaeology; and more robust consideration of heritage enhancement measures, such as working heritage themes into the design and improvements to the highway environment.”

Recommends an appropriate condition to secure implementation of field evaluation works and safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording before development takes place.

Local Members

21. The former local County Members, Mr L. Christie and Mr H. Craske (Northfleet and Gravesend West division) and Mr B. Sweetland and Mr J. Cubit for Gravesend East division, which is close to the east side of the application site, were notified of the application on the 15 May 2012. Following receipt of the additional/amended details the current local County Members, Mrs S. Howes and Mr N.S. Thandi (Northfleet and Gravesend West division) and Mr. C. Caller and Mrs J. Cribbon were notified on the 30 August 2013.

Publicity

22. The application was publicised by an advertisement in a local newspaper, the posting of 8 site notices and the individual notification by letter of some 380 neighbouring properties (including residential properties, retail and business premises, etc.) in May 2012. It was also published on our website. The publicity and notification were repeated at the end of August beginning of September 2013 following receipt of the additional/amended details.

Representations

23. Representations to the application following the original publicity and notification were received from residents of 2 nearby properties, 4 from other Gravesend residents and one from a resident living outside of Gravesend. I have also received a representation from Urban Gravesham (The Civic Society for Gravesend and Northfleet) and from the Gravesend Access Group. The concerns and objections raised to the proposal are summarised below:

Nearby residents

- It is considered that during construction high levels of noise, vibrations and volumes of dust would have a detrimental effect on local residences, especially affecting

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residents who are home during daytime hours. If this is unacceptable there will be little option but to contact Gravesham Borough Council Environmental Health.

- Considers that on completion, high levels of pollution, traffic fumes and dust will lead to poor local air quality which would be detrimental to health especially if the residential proposal, which would otherwise act as a buffer between Cobham Street and the scheme, is not forthcoming.
- Questions whether the bank bordering the road would deaden the additional traffic noise.
- Careful consideration should be given to the change in status of the road and subsequent impact on local residents.
- A life long resident from a neighbouring property is concerned about the demolition of 13 Darnley Road which is part of a Georgian terrace unique within the Conservation Area. In particular it would spoil the appearance and value of its design with its characteristic features of the early 1900's, such as the ironwork. Also, considers that as it was designed as a block of four it would also lose some degree of structural stability.
- Is concerned about the likelihood of accidents at the Darnley Road end if two-way traffic is introduced to Rathmore Road. Has observed that there are very few hold-ups in this area at present and is not convinced that the proposal would solve Gravesend's traffic problems and is in favour of retaining the current one-way system. Furthermore, is not convinced that the proposal would bring any benefits to the prosperity of Gravesend and that the funding would be better spent on pot-holes and such like which would be less costly.
- Is concerned that their rightful access to the forecourt of their property which is needed for vehicular access might be overlooked leading to its loss of use as a result of a proposed pedestrian crossing in Darnley Road.

Other Gravesend residents

- The scheme would have a major impact on the centre of Gravesend but it has not been subject to Department for Transport (DfT) assessment, approval, management or monitoring
- The phased approach to the scheme will mean a lack of coherence between phases.
- Already important elements such as better interface between the station and the town centre, aspects such as the bus station and retail/accommodation appear to have been lost from the scheme.
- It seems that the major benefits seen by the Local Planning Authority are to improve the fabric and ambience of town centre rather than to deliver transport benefits.
- The principal expenditure is associated with the construction of a very large multi-storey car park and it is not clear that this is needed or economically viable or will be an attractive gateway feature for the town.
- It is not clear how better integration of public transport will be achieved as there is insufficient space for additional bus services.
- There will still be traffic interfering with pedestrian flows and a risk of increased traffic congestion as a result of re-routing traffic.
- The scheme is likely to have negative effects on the current transportation situation in Gravesend.
- The purported benefits seem small and require confirmation by detailed evaluation according to DfT guidelines.

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- Phase 1 was controversial at a time of financial crisis. It is likely that the further expenditure of £75m on scheme will be even more controversial as the benefits seem small in relation to costs.
- There appears to be no overall business case for the scheme, yet there would be a loss of revenue to the Borough Council from the loss of the car park and financial consequences for local people, commuters and visitors through higher car parking rates.
- The benefits of mixed use development on the Rathmore Road car park site have not been carried forward into the submitted scheme.
- All major transport schemes are being reviewed in the light of the country's financial problems and it seems difficult to justify exempting this scheme from such a review.
- Recommends that the proposal should be reviewed in accordance with DfT guidance for major transport schemes, a business case should be established, set against clear scheme objectives, the multi-storey car park should be downsized or removed from the scheme proposal.
- Concerned that the scheme is not being approved as a whole. Considers that the Rathmore Road changes will not be necessary if Phase 2 does not go ahead. Concerned that the Borough Council were encouraged at the Regulatory Board meeting (June 2012) to proceed with the project anyway on the basis that the County Council KCC would withdraw funding for the scheme if it did not proceed quickly.
- Considers that a safety audit and comprehensive traffic assessment has not been carried out and that traffic flows are likely to worsen, be more dangerous and would blight the area around Community Square as well as adversely affect shop keepers.

A letter of objection was received from one respondent seeking clarification about the proposal and questions about some procedural matters. In addition a number of concerns were raised as set out below.

- The proposal does not appear to conform to the approved outline consent in several respects, not least in that it does not deliver the mix of uses, including residential development that was originally proposed on the current Rathmore Road car park and provides, only new highway and drop off areas with a large dead area to the south of the new alignment. It utterly fails to make efficient use of precious town centre land, which currently provides well located, convenient and attractive parking as well as a very valuable revenue income to Gravesham Borough Council.
- The effects of the works to Railway Place and Clive Road to be carried out under permitted development rights as highway works should be considered as part of the this proposal.
- Strongly supports the principle of improvements to the public transport interchange in Gravesend but is profoundly concerned that the Transport Quarter proposals would in fact cause harm to the town centre. The new Community Square and the area around the station would become dominated by traffic, and the scheme would introduce significant quantities of goods vehicles, including HGVs into public areas currently very attractive to pedestrians, including the new much admired Community Square. The overall effect would be to cause deterioration in the quality of environment and danger to pedestrians in that area.
- As a result of the absence of an up to date local plan in Gravesham, the preparation and approval of the outline scheme for Transport Quarter has taken place wholly outside of the statutory plan-led system. No Environmental Impact Assessment has taken place and the project has been progressed piecemeal without any serious external scrutiny and very little consultation. The piecemeal

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approach to the approval of the phases continues. Contrary to the NPPF, this scheme has avoided the scrutiny of local community involvement and consultation to which such strategic proposals normally are subject. Considers that the failure to subject the project as a whole, which is plainly a substantial scheme of much greater than merely local effect is contrary to the Environmental Impact Regulations and Directive.

- Considers that consultation over this proposal has been minimal with not one community organisation, trade association or the Urban Gravesend civic society being consulted and that an exhibition held for a few days in the Civic Centre provided minimum information.
- Phase 3 is part of the larger Transport Quarter project and should be treated as such in its assessment. The following points are directed only to the Phase 3 application, but KCC is strongly urged to refuse the application and to require the whole project to be reconsidered:
 - The scheme makes very inefficient use of land, losing 242 long term car parking spaces to realign an existing road. It is not sustainable development, and it conflicts with NPPF which requires development to optimise the potential of the site to accommodate development, [paragraph 58]. This is a poor design that would create an area dominated by traffic on a two-way highway scheme. The total area of roads and areas dedicated to traffic within the vicinity of the Station is substantially increased as a result of the scheme.
 - The parking areas in Railway Place would be removed, including the disabled spaces. These provide a vital stopping area allowing pick up and drop off at the very gateway of Gravesend's retail centre. No replacement is proposed.
 - HGV and other goods traffic serving Tesco and Thamesgate Centre, together with the traffic from the new multi storey car park and the Thamesgate Centre would have to exit the area by passing through Railway Place and Community Square. Can find no assessment of the impact of this entirely new traffic into this sensitive area. It is likely to bring severance and heavy vehicles into an area that works very well at present. The scheme conflicts with the objective of the NPPF [paragraph 35] that requires development to "*create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.*"
 - There needs to be a condition that prevents Phase 3 from going ahead in the absence of Phase 2. The net effect of Phase 3 without Phase 2 is significant net loss of parking and no bus interchange. Phase 2 funding is not certain – and is down to Network Rail, and therefore outside of KCC's control.
 - No new residential development on the car park site is now proposed – the scheme does not conform to the outline. No retaining wall is proposed, there does not appear to be any provision for access to the area south of the new alignment and therefore it is not clear how future housing could be achieved. The area south of the realigned road would become a dead area as no use is proposed for it in the scheme.
 - The scheme causes the loss of part of the early Victorian terrace at the Darnley Road end of the scheme. They are not listed, but are in fact very good examples of tall early C19th town houses predating the coming of the railway in 1849. Conservation Area consent was granted at the time that the outline proposal but subject to the contract being let for this phase. The loss of the part of the terrace is therefore a material consideration. The NPPF requires authorities to give substantial weight to the need to protect and enhance the historic environment.
 - Considers that the consultation conducted in respect of this proposal has been derisory and contends that no residents or trade organisations have been consulted or even notified.

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- In summary, considers that this is not sustainable development, it is a hugely expensive car dominated proposal wasteful of land which currently serves an important purpose to the town centre. It would lead to deterioration of the pedestrian environment and cause substantial damage to the quality of environment in the town centre. It should be subjected to an EIA, together with the rest of the Transport Quarter project. If the scheme is to go any further, full consultation with local people and residents, trade and civic societies should now take place.
- Wishes to endorse the objections to the Transport Interchange proposals sent by Urban Gravesham.
- Considers that the Master Plan for the Transport Quarter is out of character with the Riverside Heritage of Gravesend. Considers that the multi-storey car park will prove to be a future eye-sore to the environment.
- Requests that development is designed and built with reference to existing and future communities and the human scale of the inhabitants of this unique town, Gravesend.

A resident living outside of Gravesend

- Access for existing business occupiers, such as Tesco and those at the Thamesgate Centre would be made more difficult.
- The existing tram shed building should be preserved for posterity.
- The proposed car park is hideous and would be a real blot on the streetscape, totally out of keeping for the vista along Barrack Row. *[This comment and the previous comments relate to the Interchange Building proposals.]*

Urban Gravesham

- There is no certainty that Phase 2 will be implemented. Without Phase 2, Phase 3 is not logical and has no apparent benefit but would lead to loss of car parking, and income to Gravesham Borough Council, creation of a large 'dead' area to the north of Cobham Street plus the domination of the new Community Square by roads and traffic.
- The application should not be determined until there is certainty over Phase 2 or a planning condition imposed which precludes commencement of Phase 3 until funding has been secured and a timetable is in place for implementation of Phase 2.
- With the uncertainty of Phase 2, there will be the loss of Rathmore Road car park spaces, with no certainty that it would be replaced having a serious effect on the town centre's economy and increased pressure on other car park capacity in the town.
- The proposals would result in the loss of short term convenience and disabled parking at Railway Place and Windmill Street which could have a significant effect on business in the area.
- Changes to traffic circulation results in increased cars and service vehicles using Railway Place and Windmill Street, when exiting from the Thamesgate Shopping Centre and the proposed Transport Interchange car parks. Particularly concerned about goods delivery vehicles causing severance and visual intrusion, as well as introducing pollution and danger into the Community Square.
- The damaging effects to the Conservation Areas and Listed Buildings are not outweighed by the very limited benefits.

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- The proposal is more insensitive than the outline application being wasteful of land, providing a two-lane highway meandering across the former car park and large areas dominated by traffic.
- The proposals leave no room for the construction of housing on the south side of New Rathmore Road.
- Considers that the proposal should be regarded as pursuant to the outline application as it is part of the overall scheme for the transport Quarter.
- Questions why an Environmental Statement has not been included in both the outline and detailed application and the validity of the environmental reports included in the detailed application and whether a Screening Opinion led to the decision for it not to be subject to Environmental Impact Assessment (EIA). Questions the requirement for EIA with respect to the demolition of buildings. Considers that overall, the detailed application is in breach of the EIA Regulations and that any consent would be unlawful.
- Comments that there does not appear to be any assessment on the harm caused by severance, pollution and increased hazard caused by the increased number of vehicles diverted through the Community Square
- Considers that the public consultation has been inadequate including that the details of changes in traffic flows have not been spelt out or systematically consulted upon despite their crucial importance for small businesses along the route. Comment that in their experience there is widespread ignorance of what is proposed and its effects and request that a wider more systematic consultation is carried out prior to determining this application.

Gravesend Access Group

- Loss of and lack of suitable and numbers of replacement disabled parking spaces, particularly for people visiting the town and Civic Centre.
- Requests consultation on this issue.

24. In response to the further publicity and notification repeated at the end of August beginning of September 2013 at the time of writing I have received further representations from some respondents that have written in before and additional representations as follows:

Nearby residents

The two residents who previously made representations have reiterated their concerns and objections and have made the following further comments:

- Comments that the higher levels of noise, pollution, traffic fumes and dust and any reduction in noise resulting from the earth bank or noise barrier can only be accurately predicted. A reassessment should be carried out when the work is completed.
- Currently the traffic noise from Rathmore Road is negligible but with the road moving closer to them and when the traffic transfers from Clive Road it would be continuous as they can already hear the continuous traffic noise from Clive Road.
- As the noise and vibration, and air quality assessments show increased noise and reduced air quality compared to the previous assessments relative to their property is now more concerned about the impacts of the scheme.

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I have also received an additional representation which raises the following concerns:

- Concerned about loss of parking facilities for residents. Asks whether it is possible to use the spare land adjacent to the lower Wrotham Road and Cobham Street as car parking for those residents.
- Concerned about the impact of the works on the structural stability of his property and asks what measures would be taken to offset this possibility.

Other Gravesend residents

One of the residents who previously made representations has reiterated their concerns and objections. Further comments made include the following:

- Until there is an agreed core strategy/local planning framework it would be premature, unwise and risky to proceed with the proposal.
- The Master Plan for Gravesend Transport Quarter has been so overtaken by events and stripped of content and context that it needs to be reviewed and reconsidered.
- The Gravesend Transport model of 2007 should be independently checked so an assessment can be made of whether the projections contained within the planning assessment are a reliable guide for decision makers. Local people familiar with the town remain highly sceptical of the ability of new junctions between Darnley Road and Rathmore Road to cope with the weight of traffic and for two way traffic on Clive Rd and Railway place to be safe.
- Concerns about the overall management of the Transport Quarter remain. Asks whether the Department for Transport (DfT) could be asked to review the documentation for the scheme to provide reassurance that the scheme meets minimum standards. Also, whether the appointed planning consultants can provide a completed checklist confirming that the planning for the scheme meets DfT guidance requirements.
- Concern remains about control over the project, when the intention remains to proceed with large scale expenditure when the need seems to be reduced and the benefits marginal. Considers that there are obvious cheaper alternatives now available and that there needs to be a forum and a management focus for a review and for adjusting the scope of the project.
- It is clear that decisions to approve the scheme were made through the Kent Strategic Transport Programme in quite different circumstances (and assuming a quite different content for the overall Transport Quarter) and the priority for this investment needs to be reviewed in the light of other pressing needs.
- It is unclear how the overall objective for regeneration of the town would be created by taking away the car parking close to the Station, making it more difficult for the town to be accessed for commuters and potentially providing an incentive to switch to Ebbsfleet or other stations. Now that Phase 2 is not to be built, it surely calls into question the need for Phase 3.
- The focus on regeneration has led to insufficient attention to the consequences for traffic. To those of us who live locally the consequences for traffic bottlenecks at the Darnley Road junction with Rathmore Road and for traffic becoming a hazard for pedestrians using the Railway Place and the community square /Windmill St is a serious environmental and safety concern. The prospects of HGV traffic through Railway Place is of particular concern. Seeks reassurance that these aspects have been properly assessed and satisfactorily addressed.
- Asserts that it is misleading to see the project as a series of discrete investments and it should be seen as an integrated transport scheme. Seeks reassurance on

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the legality of breaking the scheme into discrete packages and suggests that this was to escape government controls on major transport schemes and to avoid conducting an Environmental Impact Assessment.

- Considers that the overall scheme as originally conceived falls into the category of a major transport scheme and should be subject to Government review in the light of other priorities.
- Considers that the proposal delivers very little advantages that could not be delivered much more cheaply by improvements to bus stops in Barrack Row. Comments that overall the expenditure of £8-10m would worsen traffic flows, increase risks for pedestrians in Railway place and the Civic square/Windmill Street area, and deliver marginal benefits compared to more modest ways of improving Barrack Row for buses.
- Recommends that approval be withheld pending resolution of the overall management responsibilities; clarity on the benefits to be delivered and the confirmation of the business case and value for money of the investment proposed. These should be reassessed once the Gravesham Core Strategy is approved and greater strategic guidance is available. Without a better understanding of the strategic context, i.e. an agreed local core strategy offering a clear development path for Gravesend, it is not clear what an appropriate transport interchange is, e.g. would it meet the needs of an extended Crossrail service? Or the needs of a developed airport in the estuary? Or of a redeveloped Swanscombe peninsula?
- Considers that without a stronger local grip on this scheme there are large risks of an inappropriate investment causing deterioration to traffic flows and pedestrian safety coupled with significant losses of car parking income and parking amenity in return for nebulous regeneration effects.

I have also received two additional representations which raise the following concerns:

- Objects to this scheme, which it is considered that along with the Heritage Quarter development it is likely to sound the death knell for this lovely old town.
- Understands that it is not even certain that all of the stages of the development even have funding, therefore turning it into a complete farce by consideration of implementing parts of the whole for no reason. Surely common sense dictates that the development should be all or nothing.
- Not only would this reduce parking in the town (and income for GBC) but it would necessitate the destruction of more of Gravesend's heritage, which should not be countenanced.
- Would like to see Gravesham Borough Council start to properly pay attention to the feelings of Gravesham residents regarding built heritage in the Borough and ensure that all agreed developments pay due attention to their surroundings.
- Considers that the scheme is totally unsuitable for purpose, horrendously expensive with no justification for it, would make traffic flow around the town worse, the additional traffic signalled junctions would add to delays experienced at present holding traffic in densely populated areas, ruin air quality and pedestrians and cyclists would suffer the consequences.
- Concerned about a 'rat run' being created along Princess Street and the possible solution of short phasing the traffic lights controlling Stone Street seriously holding up the buses that use Stone Street.
- Concerned about the dangers of commercial traffic using the Stone Street/Railway place. States that the Dry Cleaners entrance is on the apex of the corner and right in the blind spot of any articulated vehicle going around this junction.
- Concerned about the narrowness and practicality of shared cycleway/footpaths.

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- Cannot find any justification for the demolition and destruction of the integrity of late Georgian/early Victorian terrace fronting Darnley Road. Concerned about the danger and possibility of accidents of 44 tonne, articulated lorries turning from Rathmore Road into Darnley Road, as at Railway Place.
- Is concerned that taxis would not be able to use the left turn at the end of Barrack Row identified for buses only.
- Is concerned about whether lorries driving into the proposed “bus gate” at the Clive Road/Barrack Row junction could reverse back safely.
- Queries how two-way traffic in Clive Road is better than existing for passengers coming out of the station.
- Comments that by moving the bus stops up to Barrack Row it would increase the distance mothers with children would have to walk to the shops; and the elderly or infirm exiting from the station would be faced with an uphill walk and 3 times as far to reach the bus stops.
- Queries where all the disabled parking bays would be re-sited.
- Considers that in view of the inadequacy of these proposals the application should be refused.

DiscussionIntroduction

25. The proposal involves the realignment and widening of Rathmore Road, effectively to create 250 metres of new two way highway, with shared footway/cycleways either side, improvements to the railway station forecourt, together with other consequential or related works, as described in the earlier part of this report. It should be noted that some of the consequential and related works are outside of the application site because they are within or adjoining the boundaries of existing highway, and can be carried out by the Highway Authority under permitted development rights.
26. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, in considering this application, regard must be had to the relevant Development Plan Policies and National Planning Policy Framework guidance, outlined in paragraph (19) above, and other material planning considerations.
27. The proposal raises a broad range of issues as reflected in the consultee responses and representations received. In my opinion, the key material planning considerations in this case include the principle of the development in the context of the outline permission for the Gravesend Transport Quarter Master Plan and planning policies, the changes in traffic circulation and flows, loss of car parking, traffic noise and vibration, and air quality impacts, affect on heritage interests, impacts on townscape and visual amenity, biodiversity, flood risk and drainage, land contamination and construction impacts. In addition, some questions have been raised and comments made in respect of Environmental Impact Assessment, Sustainable Development and about the adequacy of public consultation.

Consideration of the principle of the proposed development

28. The principle of the new improved section of road has already been established by the outline planning permission (granted by Gravesend Borough Council) as it is one

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element or phase of the proposed Gravesend Transport Quarter Master Plan. The application is made in that context although for the reasons explained in paragraph (15) above, it is a fresh, stand alone, detailed application. If planning permission is granted, it is now expected that the proposed development (Phase 3) would take place in advance of the proposed Interchange Building (Phase 2) as there is no certainty when that might be constructed. [Besides, as the reserved matters approval for that has now expired it would need to be the subject of a fresh planning application.] Although there had previously been an expectation that Phase 2 would happen in advance of the proposals for the road, there is no stipulation in the outline planning permission to that effect. It will be noted that the Transport Assessment, Noise and Vibration and Air Quality Assessments have now been carried out to reflect this change in sequence.

29. In addition to the change in sequence of the development phasing, representations are made which question whether Phase 3 is in fact necessary if Phase 2 does not happen. The point is also made that there are no proposals forthcoming for the residential and retail/office and that the retaining wall on the south side of the new road originally proposed in the outline application to maximise the development area is not included. Furthermore, there is concern over the changed circumstances, business case, funding and value for money, management and benefits, and that phases are being considered as discrete investments/projects. It is also asserted that these matters should first be resolved and that the proposals should be reassessed once the Local Plan Core Strategy is approved and that until then determination of this application would be premature.
30. Whilst there is some inter-dependence between different phases of the Transport Quarter Master Plan, arguably this proposal for Rathmore Road is one element which is not dependent on another happening, and as the applicant has stated it is not dependent on Phase 2 being completed. The applicant has, similarly, stated that the Rathmore Road scheme would not preclude the delivery of other aspects of the Master Plan. Although circumstances have changed and the Master Plan may not be delivered in the way originally envisaged, this application stands to be considered on its merits as submitted and, in my view, it would not be appropriate to delay its determination further.
31. It is acknowledged that at the current time the situation with the Development Plan is not wholly definitive because the adopted Local Plan dates back to 1994 and the final outcome of the recent Public Hearing in respect of objections to policies in the emerging Local Plan Core Strategy will not be known for sometime. However, the aims and objectives of individual policies and the wider aspirations relevant to this application can be considered against the NPPF for consistency with it.
32. Policy CS01 of the emerging Local Plan Core Strategy (as set out in paragraph (19iv) above) reflects the presumption in favour of sustainable development contained in the NPPF and therefore, in my view, is consistent with it. Policy T0 of the adopted Local Plan relating to transport seeks amongst other things (as set out in paragraph (19ii) above) to achieve better facilities for public transport users, for pedestrians and cyclists. This policy will be replaced by Policy CS11 (as set out in paragraph (19iv) above) of the emerging Local Plan Core Strategy which supports proposals that improve public transport provision and facilities in the Borough. In particular, the development of a transport hub at Gravesend Town Centre to provide high quality interchange facilities between bus, rail, walking and cycling will be supported. Improvements will also be sought to walking and cycling facilities to provide improved access to Gravesend Town Centre. Policy CS05 also supports these improvements. Notwithstanding the current status of the Development Plan the aims and objectives of these policies are, in my

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view, consistent with the NPPF guidance which promotes sustainable transport to give people a real choice about how they travel. It is also stated in the NPPF that the Government recognises that different policies and measures will be required in different communities.

33. There are a number of components to the proposal for Rathmore Road in addition to its widening and realignment. Provision would be made for a shared footway and cycleway on both sides of the new road, safe crossing facilities, improved arrangements and facilities for drop-off and pick up at the railway station, parking for taxis and disabled parking, and improvement to the redundant stretch of Rathmore Road to the east for mainly pedestrian use. It is proposed that enhanced paving materials would be used, including those areas of improvement to be carried out under permitted development, and where appropriate landscaping be carried out. The proposals would allow Rathmore Road to become two-way and take through traffic currently using Clive Road/Barrack Row and allow Barrack Row to be re-designated for buses and taxis only, with Clive Road becoming two-way for access to the car parks and for deliveries. The existing and proposed layouts on page D1.11 indicate changes to the traffic circulation.
34. In brief, the proposals seek to provide an enhanced public realm with improved linkages for pedestrians and cyclists to and from town centre and the railway station, and put in place measures that would provide opportunities for the improvement of bus facilities and services, including the possible future development of Phase 2 or alternative proposals for the provision of a bus interchange. In that respect, arguably there would be some advantage, over the original phasing envisaged, for the new road, consequential changes to traffic flows and management to be in place beforehand. In my view, the proposals in this application would make a significant contribution in delivering the wider aspirations and benefits for integrated sustainable transport for Gravesend town centre set out within the emerging Local Plan Core Strategy, which as indicated above, I consider are consistent with the NPPF guidance for sustainable transport. Taking into account the above factors, I consider that in principle the proposal should be supported. Nevertheless, there are a number of other matters arising from the details of the proposal that need to be considered in determining the application, and these are considered below.

Changes in traffic circulation and flows

35. As indicated in paragraph (18) above the applicant has now provided a Transport Assessment Report which takes account of the proposed development being implemented in advance of the delivery of Phase 2 for the Transport Interchange building. The Assessment takes account of changes to the traffic circulation as a result of the proposals set out in paragraph (33) above and shown on the existing and proposed layouts on page D1.11 and the loss of the Rathmore Road car park and its 225 spaces. The Assessment assumes an opening year for the new road of 2014 and also considers the position for 2029 (15 years after opening) utilising 'The Gravesend Transport Model' developed during 2007.
- (i). The Assessment states that in terms of traffic generation the main influencing factor within the proposals is the change to car parking provision in the area. For the transport assessment in the 2014 and 2029 scenarios with the new Rathmore Road traffic has been redistributed from the existing car park in Rathmore Road to the Parrock Street car park. In terms of traffic distribution the main impact of the proposals is to divert traffic from Clive Road/Barrack to the new road which would be made two-way.

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- (ii). Traffic flows for the highway network around the proposed Rathmore Road Link have been modelled for the AM Peak (08:00 – 09:00 hours) and the PM Peak (17:00 – 18:00 hours). [The traffic flows in the base year of 2007 reflects the highway network before the new Civic Square was constructed when traffic from Lord Street was re-routed behind the Civic Centre along Woodville Place.] At the assumed year of opening (2014) traffic flows on the new Rathmore Road are forecast to reach 990 vehicles per hour in the AM Peak (72 in 2007) and 920 vehicles per hour in the PM Peak (138 in 2007). By 2029, traffic flows are forecast to be broadly similar to the year of opening. Traffic flows along Stone Street, Clive Road and Barrack Row are forecast to reduce by 80-90% as a result of the implementation of the scheme. Forecast traffic flows on Railway Place are expected to increase as a result of the scheme. However, the forecast flows in 2014 and 2029 on Railway Place in the AM Peak would be less than the 2007 flows and in the PM Peak there would be an increase of around 30% on the 2007 flows.
- (iii). In addition to modelling the traffic flows on the highway network, performance has also been assessed by looking at journey times from selected routes, which were Milton Road to West Street and Overcliffe to Milton Road. When comparing eastbound journey times between Overcliffe and Milton Road in 2029, there is no discernible difference with or without the proposed scheme in both the AM and PM Peak periods. There is a general increase in journey time predicted between 2007 and 2029 largely unaffected by the scheme. When considering westbound journey times between Milton Road and West Street in the AM Peak there is a significant increase in journey times predicted between 2007 and 2029 without the proposed scheme and journey times are expected to increase further as a result of the implementation of the scheme. A similar impact is predicted for the PM Peak between 2007 and 2029 but in this instance there is no discernible difference in predicted journey times in 2029 with or without the scheme.
- (iv). The performance of the network has also been assessed by looking at the queue lengths on Wrotham Road, Parrock Street, Windmill Street and Darnley Road. In 2007, minimal delays are presented in the Gravesend Transport Model and these have been used to compare the future year scenarios that have been assessed. For Wrotham Road and Windmill Street delays are predicted to increase between 2007 and 2029 in the AM Peak. Delays with the scheme are also predicted to be greater in 2029 than without the scheme. A similar situation would occur in the PM Peak although the increase in delays is predicted to be less severe. Parrock Street also has a predicted increase in delays between 2007 and 2029 in the AM Peak and a predicted increase in delays in 2029 with the scheme. However, in the PM Peak predicted delays in 2029 without the scheme are less than 2007 and in 2029 with the scheme are broadly similar to 2007. Darnley Road in both the AM and PM Peak periods has predicted delays in 2029 without the scheme that are broadly similar to 2007 and a predicted increase in delays in 2029 as a result of the scheme.
- (v). The Transport Assessment concludes that the implementation of the new Rathmore Road is not predicted to have a significantly adverse impact on vehicular traffic in the forecast year of 2029 compared with the situation without the scheme. It goes on to conclude, rather the scheme demonstrates a benefit to more sustainable modes of transport by creating an environment and connection between the railway station and the town centre that is largely free of private vehicles through altering the alignment of the current ring-road and thereby reducing severance for pedestrians and cyclists.

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36. It will be noted that a number of representations have been made about the changes to traffic circulation, including doubts expressed about the benefits of the scheme, traffic and pedestrian conflicts, traffic congestion, the Community Square and the area around railway station being dominated by traffic, and increased traffic being a hazard for pedestrians using Railway Place and the Community Square/Windmill Street and concerns about heavy goods vehicles having to use this route also bearing in mind the restricted widths and radii. Questions have also been raised about safety audit and compliance with Department for Transport (DfT) guidance.
37. The scheme is not intended to address any particular traffic flow concerns but is in essence an enabling scheme to allow improvements to the public transport facilities and their connectivity to the town centre. Changes to flows, journey times and delays arising from the proposals of the redistributed traffic within the town centre are acknowledged in the Transport Assessment. There would inevitably be some advantages and disadvantages.
38. The applicant highlights that in removing general traffic from Barrack Row the scheme would enable a public transport interchange to be created and significantly reduce traffic flows along Clive Road that would improve the pedestrian environment and connectivity between the Railway Station and the town centre. In addition, the applicant advises that provision of traffic signals at the Clive Road/Stone Street/Railway Place junction, including an “all-red” pedestrian phase, would bring a degree of control to traffic movements not currently in operation that should assist pedestrians.
39. The applicant has confirmed that a safety audit of the scheme has been carried out and further safety audits would take place at the detailed design stage. I also understand that the applicant has carried out a tracking exercise to ensure that heavy goods vehicles can safely negotiate Railway Place. In addition, I understand that changes from one-way traffic to two-way traffic and vice versa would have to be subject to appropriate Traffic Regulation Orders.
40. With regard to DfT assessment, approval, management or monitoring, the applicant advises that it is only required when a scheme is being funded by the DfT which does not apply to this scheme. There is also no requirement in the Town and Country Planning (Development Management Procedure) Order 2010 to consult the DfT as part of the planning application process on this particular scheme – the County Highway Authority being the relevant consultee relating to the highway considerations.
41. The views of The Development Planning Manager (Highways and Transportation) for the Highway Authority are set out in paragraph (20) above. In addition I have sought his further advice on the issues raised in third party representations referred to above. He has made the following additional comments:

“As an initial point of clarification, it is not the Development Planning *[their]* role to question the need or otherwise of what is proposed through a planning proposal but rather to assess its potential highway impact. Furthermore, the overall scheme of which this application forms the third phase has existing outline approval through the LPA *[Gravesham Borough Council]* through which the principal highway issues have already been considered in detail prior to that approval being granted. There was however need for consideration to be given to the highway impact of the potential delivery of Phase 3 in advance of Phase 2 which was not envisaged at the outline application stage and it has therefore been that particular aspect of this proposal which has been considered in greatest detail from a highway perspective.

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The issue of additional vehicle movements (both in respect of quantity of vehicle movements and nature of required vehicle access) through Railway Place and the Civic Square beyond as a result of the Transport Quarter proposals was considered and assessed in significant detail through the outline planning proposal including the assessment of appropriate vehicle swept paths and assessment of potential conflict with pedestrian movements. There was a need identified at that stage for the detailed highway design to acknowledge and address these points and that will essentially come through both the technical audit and safety audit processes which any detailed design will have to conform to before final approval is given by KCC [*as Highway Authority*] for any works to commence. In respect of the current proposal and, specifically, in relation to the potential for Phase 3 to precede Phase 2 it must be considered that the consequence of this would be for less vehicle movements through Railway Place as a result of the loss of the Phase 2 multi-storey car park from the built scheme. Therefore, the impact in respect of additional movements through Railway Place should Phase 3 either come before Phase 2 or if Phase 2 were never to be built would either be less initial vehicle movements or less vehicle movements overall compared to that which was previously considered and approved at the Outline stage and as such there could be no justification in raising a highway objection in that regard.

With regard to the overall re-distribution of traffic in respect of the Rathmore Road proposals it must once again be considered that the principle of this proposal has already been considered and permitted at the outline stage by Gravesham Borough Council. The Rathmore Road link scheme does not provide additional capacity and is not being secured in relation to generated development flow but instead is seeking to enable better pedestrian connection to be created between the town centre and public transport links – i.e. rail and bus facilities.

As a consequence of KCC's standard Technical and Safety Audit processes for any new or developer funded highway schemes I am satisfied that the remaining issues of design detail relating to 1) cycle lane provision (or appropriate alternative) in Darnley Road, 2) any conflict between service road and drop off area in the vicinity of the station and 3) accommodation works as a result of Phase 3 preceding Phase 2 will be satisfactorily addressed through those audit processes prior to design approval and commencement of construction.

The issue of car parking provision and management is one that ultimately rests with Gravesham Borough Council as the local parking authority. If Gravesham Borough Council is satisfied that the capacity exists to accommodate parking in existing town centre car park facilities should Phase 3 precede Phase 2 then it would be difficult for KCC to substantiate any objection in this regard. Additionally, noise and air quality issues have been considered previously by GBC as part of the outline approval process and whilst such issues are not directly incorporated into the highway consultation response, presumably any GBC requirements in respect of noise and air quality secured through the previous outline approval would have to be incorporated through the detailed design solution.

Finally, with regard to the issue of value for money and whether the projected benefits of the scheme outweigh potential additional journey times, it is not a requirement of the Development Planning [*their*] role to argue the case for the scheme in this respect, only to assess its overall impact. That being said, this is a scheme which has been approved by the Homes & Roads Partnership as part of a programme of works supporting development across Kent Thameside [*with funding*

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provided by the Homes and Communities Agency] (in particular support of public transport infrastructure improvements in this case) and so the impact assessment in this respect has to consider the wider benefits of the proposals against the potential local impact.

In conclusion, no highway objection is raised to these proposals subject to the delivery of the highway works through the appropriate KCC works procedures.”

42. Notwithstanding the representations that have been made, in the light of the views of The Development Planning Manager (Highways and Transportation) I do not consider that an objection on highway grounds relative to the changes in traffic circulation, flows, journey times and delays could be sustained. Moreover the proposals would make an important contribution towards the aspirations for improved public transport links and connectivity within the town in accordance with the relevant planning policies. However there are issues arising from the development of the new road and consequential changes to traffic circulation and flows relating to traffic noise, vibration and emissions which are considered below.

Car Parking

43. The submitted proposals would result in the loss of the Rathmore Road car park and its 225 spaces. It will be noted that representations have been received to the loss of these long term car parking spaces, the loss of overall car parking capacity in the town centre, the effect on the economy of the town centre, the loss of revenue to the Borough Council and the loss of convenience for existing users of the car park. Policy P1 of the adopted Local Plan states that the Borough Council will seek to maintain an adequate supply of publicly controlled off-street parking spaces within Central Gravesend and Policy CS 05 of the emerging Local Plan Core Strategy states, amongst other things, that the Council will manage traffic accessing and passing through the area through its approach towards the provision and distribution of public car parks, and in Policy CS11, amongst other things, states that it will ensure an adequate supply of public car parking.
44. The applicant advises that there is known spare capacity in the Parrock Street car park and that users of the Rathmore Road car park would be able to relocate there. The issue of public car parking is essentially a matter for Gravesham Borough Council. I understand that the loss of parking places at Rathmore Road car park as a result of the scheme has been discussed between the applicant and Gravesham Borough Council and would be the subject of further discussion as part of the detailed design and land negotiations since the Borough Council is also the landowner. The applicant has been reassured that alternative provision can be provided and that the delivery of the scheme would not prevent Network Rail providing additional station car parking at some later date. It will be noted that Gravesham Borough Council in its formal views on the application in commenting on the loss of car parking states that as land owner of the car park, it is a matter for them to consider through land transfer/sale negotiations. The Development Planning Manager (Highways and Transportation) has also commented on this issue as set out in paragraph (41) above and raises no objection in this respect.
45. Objections have also been raised to the loss of and lack of suitable and numbers of replacement disabled parking spaces, particularly for people visiting the town and Civic Centre. I understand that the applicant and Gravesham Borough Council have subsequently met with the Gravesham Access Group to discuss its concerns. A total of 23 disabled spaces are affected by the proposed scheme and related permitted development works. Six spaces are proposed to be provided outside the Railway

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Station as part of the scheme and their provision could be secured by an appropriate condition if permission is granted. With regard to the replacement of the remaining spaces that would be displaced, the applicant advises that Gravesham Borough Council would provide an equivalent number of replacement spaces by extending the existing disabled spaces along the northern side of Parrock Street car park, and that they would be available before the existing spaces are taken for the scheme construction. I am also advised by the applicant that disabled parking would be further considered as part of a future Gravesham Borough Council parking review.

46. The issues arising from the loss of the Rathmore Road car parking and displacement of disabled car parking elsewhere will be noted. I am satisfied that the applicant and the Borough Council have given this due consideration and will continue to do so, including the question of adequate disabled parking. On this basis and the views expressed by the Borough Council and those of the Development Planning Manager (Highways and Transportation) on this matter, I do not consider that the loss of car parking is overriding or that an objection to the proposal on these grounds could be justified in terms of the relevant planning policies relating to provision of public car parking.

Noise and Vibration

47. As indicated in paragraph (18) above the applicant has now provided a revised Noise and Vibration Assessment report taking account of the revised traffic effects of the proposed development being implemented in advance of the delivery of Phase 2 for the Transport Interchange building. The assessment examines the potential impacts of traffic noise and vibration at locations considered likely to be affected by the proposed new Rathmore Road Scheme arising from both the construction and operation in accordance with appropriate guidance and methodology, and considers mitigation measures appropriate to the impacts. The Assessment assumes an opening year for the new road of 2014 and also considers the position for 2029 (15 years after opening).
48. Consideration of the construction phase has been given to the potential of noise and vibration to affect residents and other sensitive receptors adjacent to the proposed new Rathmore Road route. It sets out measures that should be taken to mitigate the potential impacts and suggests that noise and vibration monitoring should be undertaken during the period of construction to ensure acceptable levels prevail through a Construction Environmental Management Plan agreed during detailed design.
49. With regard to the operational phase, noise levels have been calculated at all residential dwellings and other sensitive receptors within 600 metres of the Scheme and affected routes. Consideration has also been given to night-time noise levels. A qualitative assessment is made on the likelihood of traffic induced ground-borne vibration and changes in airborne vibration nuisance have been calculated for all dwellings within 40 metres of roads where noise level predictions have been undertaken.
50. The proposed new Rathmore Road would be subject to significantly more traffic when compared to the existing Rathmore Road due to the road going from one way to two-way and consequential changes to traffic circulation. In addition, the carriageway would be realigned towards the eastern end of the link. Therefore, sensitive receptors located in close proximity to the proposed new Rathmore Road have the potential to experience adverse noise and vibration impacts.
51. In addition, the introduction of the proposed new Rathmore Road would result in traffic flow changes, when compared to the Do Minimum scenario, on a number of roads

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throughout Gravesend. Receptors located nearby to such roads are likely to experience changes in noise and vibration levels as a result of these changes in traffic flows. This has the potential to result in both adverse and beneficial noise and vibration impacts at sensitive receptors.

52. The conclusions of the submitted Assessment are as follows:

“The assessment shows that, the largest changes in noise levels occur in the vicinity of the Scheme, with increases predicted at residential properties close to the proposed new Rathmore Road.

It is predicted that in the short-term 134 dwellings would experience perceptible decreases in noise level in the Do Something scenario whereas 105 dwellings would experience perceptible increases. In the long-term, six dwellings would experience a perceptible decrease in noise level with one dwelling experiencing a perceptible increase in noise level. *[In accordance with the guidance used for the Assessment a change in road traffic noise of 1 dB in the short-term, for example when a project is opened, is the smallest that is considered perceptible. In the long-term, a 3 dB change is considered perceptible.]*

Adverse noise impacts predicted to occur at residential properties in vicinity of new Rathmore Road, due to the realignment and increase in traffic flow, would be substantially reduced through the introduction of a 2.4 m acoustic barrier south of New Rathmore Road on top of the proposed embankment adjacent to the carriageway. Despite the presence of the acoustic barrier, a short-term adverse noise increase of +7.5 dB is predicted at 15 Darnley Road *[and +7.6 dB in the long-term]*. Due to the proximity of this receptor to the carriageway, the acoustic barrier is not effective for this property.

Reductions in noise are predicted for properties in vicinity of Clive Road due to closure of Barrack Row for general traffic. However, as the area mainly consists of commercial properties, any noise benefits in terms of number of dwellings would be limited. Nevertheless, in the short-term, noise decreases of -4.4 dB and -3.0 dB are predicted for the properties of 6A Railway Place and 16A Stone Street respectively.

For the majority of receptors, only a small (<10%) or no change in airborne vibration nuisance is predicted (2916 out of 2918 dwellings) with the proposed Scheme in place. 686 dwellings are predicted to experience an increase in vibration nuisance of 10% or less, 868 dwellings would experience no change and 1362 dwellings would experience a decrease in vibration nuisance of 10% or less. The largest increase in airborne vibration nuisance is predicted to occur at the property of 15 Darnley Road where an increase in nuisance of 11% is predicted. The largest predicted decrease in vibration nuisance of 16% would occur at the property of 6A Railway Place.

Introduction of the Scheme would lead to both reductions and increases in noise and vibration at a number of sensitive receptors in Gravesend. On balance, when considering perceptible changes in noise and vibration, the assessment shows that introduction of the Scheme would have a beneficial impact on the noise environment in Gravesend in the short-term. In the longer-term, however, the benefit would be less pronounced and the impact of the Scheme would tend towards neutral.”

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53. In addition to the above conclusions, the following considerations should also be noted:

Receptors considered being most at risk of experiencing adverse traffic induced ground-borne vibration impacts due to the Scheme are 15 Darnley Road and 6A Wrotham Road as these would be located closest to the proposed new Rathmore Road. However, these properties are currently located on relatively busy roads and would already be exposed to a certain degree of ground-borne vibration. Furthermore, elevated levels of traffic induced ground-borne vibration can usually be attributed to undulations and/or irregularities in the road surface. Therefore, when considering the existing environment and the fact that the road surface of the proposed new Rathmore Road would be smooth, no adverse traffic induced ground-borne vibration impacts are expected.

An assessment has also been made of properties that would be eligible for noise insulation under the Noise Insulation Regulations 1975 due to the increased traffic noise. It is currently estimated that the western facades of 15 and 17 Darnley Road would be eligible. Under these Regulations the Highway Authority would be responsible for reassessing the eligibility for these properties following opening of the Scheme.

54. The Assessment has been reviewed by both the Borough Council's Environmental Health Officer (EHO) and our own Noise adviser as set out in paragraph (20) above. The Borough Council's EHO accepts the conclusions of the report but notes that occupied flats at 23 and 24 Stone Street do not appear to have been considered. The Borough Council also suggest that further to previous comments recommending the approval of a Code of Construction Practice, that the contractor enters into an agreement under Section 61 of the Control of Pollution Act 1974 as the best way to deal with construction noise. The County Council's own Noise Adviser's initial comments highlighted that the Assessment made no prediction for likely construction noise and vibration levels and the number of receptors affected by construction had not been quantified. It was therefore requested that predictions of noise and vibration from each phase of the proposed construction works should be provided in order to enable the impact of construction noise to be properly assessed. Some omissions from the report relating to the operational phase were also highlighted and further information requested in order to establish whether the conclusions of the Assessment are reliable.
55. The applicant has now addressed these matters in an addendum including the two receptors, flats at 23 and 24 Stone Street, identified by Gravesham Borough Council. Further noise modelling has been undertaken but in view that the applicant's consultant has now changed from Jacobs to Amey, the model had to be converted to run on a different noise modelling software package. As a consequence there are some minor differences in the results and moderate adverse impacts in the short term (reducing to minor adverse in the long term) have now been identified for 5 properties in addition to 15 Darnley Road which is assessed as having a major adverse impact in the short term (reducing to moderate adverse in the long term). These include 6A Wrotham Road and 1-4 Cobham Street although some uncertainty is attached to the results of the latter 4 due to differences in the noise modelling software package used and the number of noise reflections it calculates. In the circumstances it is recommended that post-construction noise monitoring is undertaken at 1-4 Cobham Street, 6A Wrotham Road and 15 Darnley Road to confirm, or otherwise, the predicted noise levels. The Assessment shows that the flats at 23 and 24 Stone Street would not be subject to perceptible changes in noise levels. Our Noise Adviser's further advice is as follows:

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Although the response does not include construction noise predictions, notes that the project engineers have committed to gaining consent under Section 61 the Control of Pollution Act 1974 prior to undertaking construction works. It is considered that this consent would allow the local authority to adequately ensure that the impact from construction noise can be minimised.

Notes that the further information relating to operational impacts has been prepared by Amey based on a new noise modelling exercise using different software to Jacobs. Also, that as a consequence the modelled noise levels have changed due to reasons set out by Amey in their report. Highlights that the remodelling has resulted in minor changes to noise levels and consequently the numbers in the tables presented by Jacobs may be affected. It is therefore requested that Amey either confirm that the numbers set out in tables in Jacobs report are correct, or alternatively reissue the tables. *[These tables have now been provided and the applicant advises that there is no significant difference from the Jacobs Assessment. I am currently awaiting confirmation that our Noise Adviser is now satisfied on this matter.]*

Considers that, assuming that the tables are correct, or show only minor changes, the assessment is satisfactory, and demonstrates that the project would lead to a net benefit in terms of noise exposure of the local population. However, considers that noise monitoring should be undertaken following construction of the project to ascertain whether any of the properties that have been shown to experience an adverse change in noise levels would be eligible for Noise Insulation.

56. I am currently awaiting the further views of our Noise Adviser and any further views that Gravesham Borough Council may wish to make on the Addendum to the Noise and Vibration Assessment. I am also notifying the 5 additional properties now identified as having changes to noise levels with moderate adverse impacts at 1-4 Cobham Street and 6A Wrotham Road. I will report any further views or representations at the meeting. Subject to that and appropriate conditions, relating to construction, post-construction noise monitoring and mitigation measures, and in the light of the views our Noise Adviser and Gravesham Borough Council I would not raise an objection on grounds of unacceptable noise and vibration impacts.

Air Quality

57. As indicated in paragraph (18) above the applicant has now provided a revised Air Quality Assessment taking account of the revised traffic effects of the proposed development being implemented in advance of the delivery of Phase 2 for the Transport Interchange building. The Assessment includes a qualitative assessment of the effect of the construction process on air quality and a detailed assessment of the effects of vehicle emissions from road traffic on local air quality in line with appropriate methodology to determine whether the potential impacts of the development would compromise statutory limits with regard to air quality, and considers mitigation measures appropriate to the impacts. The report states that the methodology for the air quality assessment was agreed with Gravesham Borough Council.
58. The Assessment includes the impact of proposals on the immediate surroundings of the new road, designated Air Quality Management Areas (AQMA's) and the wider network, and identifies that there would be both some improvements and reductions in air quality. More particularly, 3 residential properties at 15 and 17 Darnley Road and 58 Cobham Street closest to the proposed scheme are assessed as having air quality impacts that

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are likely to exceed targets. The basement and ground floor level of 15 and 17 Darnley Road are predicted to experience increases in NO₂ pollutant concentrations above the Air Quality Objectives (AQOs). The Assessment states that the Borough Council's Environmental Health Officer (EHO) was consulted on the predicted exceedences at these locations and to agree on mitigation measures. The EHO suggested that it may be appropriate for the basement and ground floor to be declared as a commercial designation rather than residential, thereby negating the need to expand the AQMA. Whilst the first floors can remain residential as the predicted levels are below the AQOs. 15 and 17 Darnley Road are currently private properties and if the re-designation of the properties is not possible, they could be fitted with suitable mechanical ventilation system which draws external air at first floor level. The system would then positively pressurise the properties, such that polluted air does not enter through the doors and windows of the basement and ground floor. The Assessment highlights that 58 Cobham Street would need monitoring to determine whether the predicted exceedence at this location, is likely.

59. The assessment has been reviewed by both the Borough Council's Air Quality Officer and our own Air Quality adviser as set out in paragraph (20) above. The Borough Council accepts the findings of the latest Assessment and whilst the applicant's intention to purchase 15 Darnley Road is noted careful consideration would need to be given to mitigating the exceedences at 17 Darnley Road, and 58 Cobham Street. It is also advised that to more accurately inform the air quality assessment process, the applicant carries out some monitoring at these locations, particularly since the exceedence at 58 Cobham Street is only marginal and actual monitoring (rather than predictions) may assist to resolve the matter. The County Council's own Air Quality Adviser's initial comments highlighted some omissions and sought clarification on a number of matters as detailed in paragraph (20) above.

60. The applicant has now addressed these matters in an addendum. In response to the matters raised by the Borough Council the applicant makes the following comments:

"The air quality issues that have been identified at No.17 Darnley Road and No.58 Cobham Street through the revised Air Quality Assessment report are acknowledged. As neither of these properties would be physically affected by the scheme it is not proposed that they are purchased. It is proposed that further monitoring is undertaken at both addresses so that a better understanding of the impacts can be determined. Mitigation of the air quality impacts will be proposed following monitoring, during the detailed design of the scheme with the aim of having agreed mitigation measures prior to the start of construction in discussion and with the consent of the owners. Where mitigation is not acceptable to property owners, this would be dealt with through claims under Part 1 of the Land Compensation Act. The applicant proposes to undertake air quality monitoring at No.17 Darnley Road and No.58 Cobham Street. Where exceedences are confirmed, mitigation measures are to be proposed for the approval of property owners."

61. In response to the issues raised by our Air Quality Adviser about construction activities, the applicant suggested that these are dealt with in a Construction Environmental Management Plan (CEMP) and is included as a planning condition. In response to the issues relating to the operational phase, the applicant has clarified why the value of 0.5 was used in the model and that this presents a worst case scenario, the base year of 2010 was utilised to calculate emission factors, accepts inclusion of agreed mitigation measure as a planning condition and does not consider that contour plots are a formal requirement or that the lack of them reduces confidence in the methodology or

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conclusions. Our Air Quality Adviser accepts the responses given, including that the mitigation measures be covered by condition, and has no further comment to make.

62. If permission is granted, conditions could be imposed requiring a Construction Environmental Management Plan, and additional monitoring to be carried out as part of the detailed design and appropriate mitigation agreed in discussion with the owners of properties before any development takes place. Therefore subject to this, and in the light of the views of Gravesham Borough Council and our Air Quality Adviser I would not raise an objection on grounds of unacceptable air quality impacts.

Heritage Interests

63. The application site is partly within and otherwise adjoins or is close to the Darnley Road and Upper Windmill Street Conservation Areas. In addition, the related works proposed to be carried out under permitted development referred to in paragraph (12) above and also shown on the scheme plan on page D1.7 are partly within the Darnley Road, Upper Windmill Street and King Street Conservation Areas. There are also a number of Grade II Listed Buildings adjoining the application site and the roads affected by the related works. Given the physical changes arising from the proposals, which would include demolitions, removal of trees, changes in levels, creation of new highway, erection of an acoustic barrier and retaining/boundary structures, changes to paved surfaces and kerbing, lighting and landscaping works, the character and appearance of a number of Conservation Areas and the setting of a number of Listed Buildings would be affected. [The extent of the changes can be seen on the scheme plan on page D1.7 and from the cross sections on pages D1.8 to D1.9.] There is also the potential for archaeological remains to be affected by below ground excavation.
64. As outlined in paragraph (19) above, the adopted Local Plan attaches particular importance to the safeguarding and enhancing of Conservation Areas, the maintenance of the integrity of Listed Buildings, development making a positive contribution to Conservation Areas, a presumption against demolition of Listed Buildings in Conservation Areas, and identification, recording, protection and enhancement of archaeological sites. Similarly, the emerging Local Plan Core Strategy accords a high priority towards the preservation, protection and enhancement of heritage and the historic environment. The NPPF highlights the need to consider the significance of any heritage assets affected, also to take into account the relative significance of loss of any building or other element affected and its contribution to the significance of a Conservation Area as a whole, and give great weight to the conservation of designated heritage assets when considering the impact of a development on its significance.
65. The application was accompanied by a Heritage Statement which considered the heritage assets (*Archaeological Remains, Historic Buildings, and Historic Landscapes*) within a study area extending 150 metres beyond the footprint of the proposed scheme. The assessment excluded consideration of the requirement for the demolition of 13 Darnley Road on the basis that Conservation Area Consent has already been granted for that (together with the boundary walls of 15 Darnley Road and The Lodge), as referred to in paragraph (10) above. The assessment identified 46 heritage assets, including seventeen Grade II Listed Buildings spread across the study area including a number in six Conservation Areas and 23 known archaeological remains across the study area. The potential for the presence of unknown archaeological remains within the Scheme footprint is considered to be low, but it is proposed that a programme of archaeological investigation by trial trenching is undertaken prior to construction.

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66. In accordance with appropriate criteria set out in the Heritage Statement, the Listed Buildings and Conservation Areas have been assessed to be of high significance; the significance of the other heritage assets has been assessed as low or negligible. Of the 46 heritage assets, eight have been identified that would be affected by the proposed scheme. The assessment concludes that of these eight heritage assets, the effects on the setting of three would be adverse and on the remaining five beneficial as summarised below. The significance of these effects has been determined as a combination of the value of the asset and the magnitude of impact:

The realignment of the road with a new entrance off Stone Street would have an adverse impact on the setting of both 20-24 Stone Street and Upper Windmill Street Conservation Area. The impact would affect positive views within the Conservation Area and would also impact upon the general character by the introduction of further road elements. The mitigation for this would be through the use of improved paving materials as part of the scheme design. The significance of effect of the scheme on these assets is considered to be moderate adverse.

There would also be an adverse impact on Darnley Road Conservation Area. The doubling of the road width would impact upon positive views within the Conservation Area and would also impact upon the overall character. The mitigation for this would be through the use of improved paving materials as part of the scheme design. The significance of effect of the scheme on these assets is considered to be slight adverse.

The scheme would have a beneficial impact on five heritage assets. The area around Gravesend Railway Station (counted as two, being either side of the railway), the Railway Bell Public House in Garrick Street, the Statute of Queen Victoria in Darnley Road and the setting of King Street Conservation Area would all be improved through the addition of new uniform paving materials. King Street Conservation Area in particular would be slightly improved by the use of a continuous paving surface from the public space in adjacent to Stone Street. The significance of effect of the scheme on these assets is considered to be slight beneficial.

67. In terms of the development within the application site itself, the adverse impacts identified relate to the setting of 20-24 Stone Street, the Upper Windmill Street and Darnley Road Conservation Areas and a beneficial impact identified in respect of the area around the Railway Station. The remaining beneficial impacts relate to assets affected by the related works to be carried out as permitted development.
68. In general, I consider that the conclusions of the assessment of the heritage assets set out above can be accepted although arguably the effect on Darnley Road Conservation Area would be greater when taking into account the demolition of 13 Darnley Road and The Lodge located to the rear in Rathmore Road. Whilst their demolition has already been assessed and accepted both in granting outline consent for the Transport Quarter proposals and in the subsequent granting of Conservation Area Consent, the physical change has not yet taken place. [It should also be noted that permission is also sought for their demolition (together with the front and rear boundary walls of 15 Darnley Road) as an integral part of this fresh application.] Therefore the resultant change arising from the proposal does not just relate to doubling of the road width but the loss of these two properties. In my view, the demolition of The Lodge which is a single small two storey property (that has been used for a variety of retail purposes) would not be detrimental, as it has no architectural merit and has little or no significance to the Conservation Area as a whole.

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69. With regard to the demolition of 13 Darnley Road which is one of a terrace of four it will be noted that a number of objections have been received including an owner occupier of one of the other three. I would acknowledge that the consequence of its demolition would be some diminution of the integrity of the terrace and contribution to the character and appearance of the Conservation Area. Nevertheless, I do not consider its loss per se or the effects arising from it would be overriding reasons in themselves for not granting planning permission. Moreover I consider that the remaining three properties as a terrace would continue to have an acceptable appearance in terms of their proportions and balance together as a whole. As such they would still make an important contribution to the character and appearance of the Conservation Area. However, it would be necessary to ensure that the gable wall of 15 Darnley Road is sympathetically constructed in matching brick work to respect the character of the terrace as advised by our Conservation Architect. If permission is granted this could be covered by an appropriate condition.
70. It would also be appropriate to require the full recording of the building prior to demolition and for salvaging of interior and exterior architectural features and elements as requested by English Heritage. I consider that these should reflect those that have already been imposed on the Conservation Area Consent granted by the Borough Council including a further condition which states that demolition should not commence until such time as a contract is let for the road construction. English Heritage has also requested that, if possible, the items of salvage be incorporated into adjacent buildings in the terrace. Realistically this is unlikely to be possible and therefore I do not consider that it would be reasonable to include such a stipulation.
71. The detailed design of the scheme, use of high quality materials and landscaping would be critical to mitigating the adverse impacts arising from the development and securing the beneficial improvements around the railway station and to the setting of the Listed Building. The timber acoustic barrier at the top of the embankment would be a significant feature of the new road and could have a negative visual impact to the improvements otherwise being made particularly to the public realm around the railway station and the Conservation Area. The barrier would only be acceptable in visual terms if good quality materials and finishes are used together with some tree and shrub planting on the embankment to soften its appearance and assist in absorbing it into the background. It is proposed that the barrier would have a close boarded fence type cladding. In response to the comments made by our Conservation Architect and Gravesham Borough Council about the barrier the applicant has accepted the need for landscaping but has not agreed to build a brick wall instead of the proposed timber barrier. Indicative details of landscaping to the barrier have now been submitted and are, in my view, sufficient to demonstrate that the timber barrier would be acceptable although further consideration of the detail of the landscaping proposals would be needed. Materials and detailing for the proposed retaining walls to the rear of 20-24 Stone Street would also need careful selection in order that they contribute positively to the proposed enhancements. If permission is granted, all of the above matters could be covered by conditions requiring full details of the landscaping and the detailed design of the scheme, including details and samples of materials to be used for the acoustic barrier, retaining walls, and all paved surfaces to be submitted for prior approval.
72. Land to the south side of the new road following construction is currently proposed to remain with a tarmac finish pending decisions about its future use. Views across this area from the rear of the adjoining Cobham Street properties which are within the Darnley Road Conservation Area would be interrupted by the 2.4 metre high acoustic barrier. It is acknowledged that it would alter the character of the Conservation Area

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but, in my view, the visual impact from this side of it is less significant in that unlike the other side it is not seen on top of the embankment and besides these views are not from public view points. Moreover the visual impacts would be offset by its benefits in mitigating the effects of traffic noise on the new road.

73. With regard to archaeological remains the County Council's Archaeological Officer has requested the imposition of a condition to secure implementation of field evaluation works and safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording before development takes place. She has also asked that consideration be given to heritage enhancement measures, such as working heritage themes into the design and improvements to the highway environment. This could, for example, include plaques and signs relating to any relevant archaeological interests. Further consideration would need to be given by the applicant in consultation with the Archaeological Officer as to what might reasonably be incorporated into the detailed design within the context of the site and could be covered by an appropriate informative if permission is granted.
74. As discussed above there would be some adverse effects on heritage assets although the significance of these impacts is not assessed higher than moderate adverse. Conversely, it is considered that there would be some beneficial effect to the area around the railway station. However the success of any beneficial effects and mitigation to offset the negative effects would depend upon the detailed design, use of high quality materials and landscaping. These matters could be secured by appropriate conditions. Also, subject to appropriate conditions I consider that the proposed demolitions would be acceptable. In addition, the possibility of buried archaeology could be covered by appropriate conditions. Overall, on this basis, I do not consider that the proposal would give rise to unacceptable harm to the acknowledged heritage assets and I would not therefore raise a planning objection to the proposal in these respects.

Townscape and Visual Impact

75. It is also necessary to consider more generally the townscape and visual impacts of the physical changes (referred to in paragraph (63) in the section above) arising from the proposals. In addition to those more directly concerned with heritage assets, the relevant planning policies give priority to conserving and enhancing the built environment, set out design criteria for new development including the need to avoid causing harm to the amenity of neighbouring occupants, recognise that good design is a key aspect of sustainable development and should contribute positively to making places better for people.
76. The application was accompanied by a Townscape and Visual Impact Assessment covering the site and its wider context, although as it is in an urban scheme the area is relatively tight, and physically and visually defined by the existing built elements. There are no landscape designations directly affected by the proposals. However there are Conservation Areas affected as referred to and considered more specifically in the section of the report above. There are inevitably overlapping considerations.
77. The Assessment includes a baseline study of the existing site and the surrounding townscape and visual receptors. It considers the impacts on the existing townscape character and fabric and assesses visual impacts during construction, in winter year 1 (when mitigation planting would be immature) and in summer year 15 (when mitigation planting would be established). The assessment is summarised below.

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Baseline Townscape Description

The existing Rathmore Road is a narrow, enclosed, sunken one way street that provides access to the south side of Gravesend Station. Along the southern side of Rathmore Road there is a grass bank with a line of early mature hornbeams on top of a stone retaining wall. This provides a reasonably attractive boundary to the road and the trees break up the view of cars in the adjacent car park. At either end of Rathmore Road advertising hoardings feature on the walls of No. 13 Darnley Road and Bar 24.

The Rathmore Road car park lies to the south of the site, forming a linear feature extending from the rear of properties in Darnley Road and Cobham Street through to Wrotham Road. The houses in Cobham Street have small backyards adjoining the car park providing an inconsistent mix of boundary treatments and informal back accesses. Occasional self sown sycamore trees have established along the boundary. Overall the site appears untidy and lacking in visual unity and cohesion.

Townscape Impact Assessment [The significance of the effect on townscape is determined from a combination of townscape sensitivity and magnitude of impact.]

Overall the proposals are assessed as having a slight beneficial effect. Whilst it introduces a new road of increased scale with re-routed traffic and associated paraphernalia such as lighting, signage and traffic lights, it also offers the opportunity to provide a quality public realm scheme and visual unity to a previously run down and disjointed urban area. It also provides an improved setting for valued features such as the listed station building and allows for the lost line of hornbeam to be replaced with new street trees. The acoustic fence contains the impact of the scheme along the southern boundary.

The significance of effects on the townscape would increase from slight to moderate beneficial when taking account of the permitted development works proposed.

Visual Impact Assessment [The significance of the visual effect is determined from the sensitivity of the visual amenity receptor and the magnitude of the impact.]

There are relatively few residential properties in the area due to the close proximity to the town centre. Cobham Street is the primary residential area with views over the site.

During construction there would be a moderate to significant adverse visual impact on a number of receptors including residents, people at their place of work and other users of the built environment. This is to be expected within an urban environment, particularly given the proximity of the area to the town centre.

However, upon opening the visual effects of the scheme would generally reduce to negligible to slightly adverse, but with some properties on Cobham Street experiencing moderate adverse impacts. The residual effect in the longer term would be similar as the proposals are not dependent on maturing vegetation for mitigation. However there would be a slight betterment and softening of the public realm as the trees become established features in the view.

78. I consider that in general the proposals would result in improvements to the townscape particularly to the setting of the Railway Station and this would be further enhanced by the proposals for the retained 'old' section of Rathmore Road providing a mainly pedestrian connection to and from the Town Centre. As referred to in consideration of the heritage interests the success would depend upon the detailed design, use of high

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quality materials and landscaping which could be secured by appropriate conditions. I also consider that if permission is granted, it would be appropriate as requested by the Borough Council to require submission for approval of lighting details and the relevant details of enhancement for the retained 'old' section of Rathmore Road. With regard to the Borough Council's comments about the use of black macadam for the inset parking area and taxi rank this could be considered as part of the detailed design of the scheme and covered by condition if permission is granted.

79. It will be noted that there would be some adverse visual impacts arising from the proposal most notably during construction and initially upon opening of the scheme. In the longer term there would be some improvement to the public realm but for some properties the scheme would still have a moderate adverse impact. It does, though, need to be borne in mind that these are private views from these properties. Options for additional mitigation are limited without encroaching onto the residual land on the south side of the road, for which decisions about future use are pending. The acoustic barrier does however provide some mitigation to the visual impacts which together with the lower level of the road would screen the traffic from most views. In addition, as the tree planting matures now proposed on the embankment to the north side of the acoustic barrier this would provide some additional benefit to these properties as well as to the public realm.
80. The visual changes are acknowledged but overall I do not consider that the degree of change would be of a magnitude and significance that would result in unacceptable harm to residential amenity in terms of outlook or visual harm to the built environment in general. Subject to appropriate conditions, I consider that the design of the scheme would otherwise contribute positively to the public realm and to the townscape, and accord with the objectives of the Development Plan Policies which require development to be of a high quality design.

Lighting

81. Proposals for street lighting include 8 metre columns along the road and footways, and 10 metre columns outside the Railway Station for convenience and safety. Although full details are not provided at this stage I expect the general approach would be to direct the light to where it is needed and to ensure light pollution can be minimised. In principle, I would not raise objection to the proposed lighting but, if permission is granted, it would be appropriate to reserve details by condition so that the type and position of the lighting can be controlled.

Ecology

82. An Ecological Scoping Report and a Bat Survey Report were submitted with the application. Bat emergence surveys carried out confirmed that the buildings to be demolished are unlikely to offer any potential to support roosting bats. The County Council's Biodiversity Officer notes that there is limited potential for ecological impacts beyond the potential for the presence of breeding birds and advises compliance with the mitigation measures in the Ecology Scoping Report prior to commencement of the development. In addition, she advises the recommendation to use native species planting and bird nest boxes in the landscape proposals should be implemented. If permission is granted, these matters could be covered by appropriate conditions.

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Flood risk and drainage issues

83. A Flood Risk Assessment submitted with the application which includes the following conclusions:

A review of the available data, primarily the published Environment Agency flood risk maps and the Kent Thameside Strategic Flood Risk Assessment indicate that the proposed development lies within Zone 1. There is no record of any form of historic flooding affecting the development site.

However as the station is located in a cutting there is the potential for it to receive localised exceedance flow and the design should aim to ensure that this can be conveyed through or around the station, rather than ponding.

As the development site is in a heavily urbanised area there would be no change to the existing extent of impermeable surface. Consequently the proposed development would not alter existing levels of runoff and it is the intention to reuse existing drainage features wherever possible and the runoff will continue to drain either to soakaway or the public sewer. The development proposals would not alter the existing overland flow paths.

The Environment Agency has raised no objection in respect of drainage issues subject to a condition controlling infiltration of surface water drainage into the ground and therefore I do not consider that there is any basis for an objection on grounds of flood risk or loss of flood storage capacity.

Land contamination

84. A Desk Study Report which assesses potential contaminated land, geotechnical and construction issues was submitted with the application. In respect of contamination the report highlights that there are potential sources of contamination from historical use of the site and surrounding area, a timber yard and tyre depot at the eastern extent of Rathmore Road, the railway and former goods yard adjacent to Barrack Row, existing highways, and nearby landfill sites. It also notes that the current site uses which may also be potential sources of contamination. The conceptual model developed for the site indicates that several complete pollutant linkages may be present; however, an assessment of the risks suggests that made ground in the vicinity realigned Rathmore Road associated with former use of area as a tyre depot and timber yard and made ground in vicinity of Darnley Road Bridge associated with the railway are the only ones likely to be of concern and warrant further investigation. The report recommends that as part of the main intrusive site investigation works, exploratory holes are carried out in these areas to assess the nature and depth of any made ground, with samples sent for chemical analysis.
85. In the Planning Statement the applicant states that as part of the main intrusive site investigation works, exploratory holes were carried out to investigate the potential for contamination in the made ground at the eastern end of Rathmore Road. Slightly elevated hydrocarbons and some metals (namely copper, lead and zinc) were recorded but assessed not to be elevated enough to pose a risk to human health in the long term. No mitigation was therefore proposed. In its initial views, the Borough Council requested that further details be provided to support the applicant's conclusion that no mitigation is required to ensure no adverse risk to human health is introduced from potentially contaminated land. In response the applicant commented that:

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A large part of the site has been identified in the Heritage Statement as having been allotment gardens prior to the development of the current day Rathmore Road car park and is of low risk of contamination. However, for part of the car park, due to a previous site use, the risk of encountering contamination is medium.

Further intrusive geotechnical investigation is proposed. Any contamination or potential sources of contamination discovered at this stage would be thoroughly assessed and further actions determined prior to the commencement of development.

Should unexpected contamination be encountered once development has commenced, a full remediation strategy would be prepared by the Principal Contactor and agreed with the Local Planning Authority. The required works would be carried out in accordance with the agreed strategy.

86. In its further views the Borough Council acknowledges further intrusive investigation would be undertaken with a view to suitably remediating any contamination prior to the commencement of works. If permission is granted, these matters could be covered condition as also requested by the Environment Agency in order to prevent unacceptable risks from pollution. Subject to that I would not raise an objection in that respect.

Construction and Waste Management Issues

87. Noise and Vibration and Air Quality issues associated with construction activities are considered in the relevant sections above. In addition to measures to minimise noise nuisance and dust nuisance, other issues relating to construction activities such as hours of working, location of site compounds and operative/visitors parking, details of site security, details of any construction accesses and measures to prevent mud being deposited on the local highway network could also be included in a Construction Environmental Management Plan. There is also a requirement for Site Waste Management Plan under The Site Waste Management Regulations 2008 dealing with the handling, use and disposal of surplus materials and waste for such construction sites.

Environmental Impact Assessment

88. Some questions have been raised and comments made in the representations, as set out in paragraph (23), in respect of Environmental Impact Assessment. I can confirm that consideration has been given to this matter. Initially, the applicant had requested a screening opinion under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 before the application was received. Further information was sought from the applicant for consideration before adopting a screening opinion. In the event, the applicant proceeded to submit the application before that was concluded.
89. However upon receipt of the application in accordance with our normal practice we proceeded to adopt a screening opinion under Regulation 7 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. As referred to in paragraph (17) above, the Screening Opinion concluded that that Environmental Impact Assessment is not required and therefore that the application did not need to be accompanied by an Environmental Statement. The permitted development works were also taken into account in reaching that conclusion. Gravesham Borough Council had

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also previously adopted a screening opinion for the outline proposals for Gravesend Transport Quarter Development as a whole and also concluded that Environmental Impact Assessment was not required. However it needs to be borne in mind that such conclusions do not mean that the proposed development is without any environmental impacts, but rather that such impacts are not of wider than local significance and are fully capable of being addressed as part of the normal planning assessment process.

Sustainable Development

90. As mentioned in paragraph (34) above, the proposed development is judged to be sustainable in transport terms. However the concept of sustainable development is an overarching one and attempts to bring to together a wide range of aspects within the three broad headings of environmental sustainability, economic sustainability and social sustainability. Given the breadth of interests at stake, there will often be some fundamental conflicts between certain aspects, and very few projects will be able to demonstrate sustainability in all aspects. In this instance, a case can be made out that the project is very much part and parcel of a transport and environmental improvement programme for the town as a whole, with therefore some significant associated benefits for the local economy. However, it is unlikely to be possible to achieve all of these benefits without some more localised environmental disbenefits, thereby undermining some of the environmental and social sustainability credentials. Nevertheless, planning decisions are all about balancing the various benefits and disbenefits, and in this particular case I consider that the wider sustainability credentials significantly outweigh the localised impacts, especially if those local impacts can be satisfactorily reduced by appropriate mitigating measures.

Consultation Issues

91. With regard to comments about the adequacy of public consultation, it will be noted from paragraph (21) that the application was published on our website, publicised by site notices and newspaper advertisement and some 380 neighbouring properties were notified. This was carried out in May 2012 and again at the end of August beginning of September 2013. In addition, the applicant held an exhibition at the Civic Centre, Gravesend between the 8 and 21 May 2012.

Conclusion

92. As discussed and acknowledged above, this proposal raises some significant issues, not least the various effects on local amenity and the local environment, particularly those relating to traffic noise and vibration and emissions, heritage assets, townscape and visual amenity. Whilst I have not raised planning objections to the proposal in respect of these matters, arguably it does not fully accord with Development Plan and the National Planning Policy Framework in all respects. However, bearing in mind the mitigation proposed, I consider that in the long term the proposals would provide an acceptable environment for existing residents and businesses and result in overall improvements to the public realm. Moreover the proposals would improve the pedestrian environment and connectivity between the Railway Station and the town centre and would be an important step forward for the wider aspirations envisaged by the Transport Quarter proposals for Gravesend including the future creation of a public transport interchange. Objections to the principle and questions about the benefits of the proposals in general and to this application in particular will be noted, but within the limitations of the existing highway/transport infrastructure within the town centre, I consider that it would open up opportunities for a more integrated approach to transport

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in accordance with the relevant planning policies, including those set out in the emerging Local Plan Core Strategy. On balance therefore, bearing in mind the various mitigation measures proposed and appropriate conditions as discussed above, and subject to any further views received by the Committee Meeting, I consider that permission should be granted.

Recommendation

93. SUBJECT TO any further views received by the meeting, including further reactions to noise assessment, I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT to conditions, including conditions covering:

- implementation of the permission within 5 years;
- the development to be carried out in accordance with the permitted details and as otherwise approved pursuant to the permission;
- submission for approval of details of horizontal and vertical alignment;
- submission for approval of details of the highway design and construction including all paved surfaces;
- submission for approval of details for the enhancement of the retained section of the existing road;
- submission for approval of details of all structures, including the acoustic fence, retaining walls, and street furniture;
- submission for approval of details of highway lighting;
- submission for approval of details, implementation and subsequent maintenance, of landscaping proposals, to include planting proposals for the slope on the south side of the new road;
- submission for approval of details of street lighting,
- implementation of the recommendations for biodiversity mitigation and enhancement,
- building recording prior to demolition of 13 Darnley Road;
- details of architectural items to be salvaged from Darnley 13 Road to be agreed with the Borough Council;
- demolition of 13 Darnley Road not to commence until such time as a contract is let for road construction;
- submission for approval of details for the construction of the gable wall to 15 Darnley Road;
- archaeological requirements;
- control of potential land contamination;
- control of infiltration of surface water drainage into the ground;
- submission for approval of details of a Construction Environmental Management Plan/Code of Construction Practice;
- details of further air quality monitoring to be submitted together with appropriate mitigation proposals before the development is commenced;
- details of post construction noise monitoring to be submitted together mitigation proposals and a timescale for their implementation; and
- provision of the 6 disabled parking spaces shown on the submitted drawings;

94. I FURTHER RECOMMEND THAT the applicant BE ADVISED by way of an informative of the following:

- the Borough Council recommends that the contractor should enter into an agreement under section 61 of the Control of Pollution Act 1974 to deal with construction noise.

Item D1

Proposed realignment and widening of Rathmore Road, Gravesend – GR/2012/0441 (KCC/GR/0148/2012)

- the Archaeological Officer requests that consideration be given to including heritage themes in the detailed design where relevant.

Case officer – Paul Hopkins	01622 221051
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Background documents - See section heading
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