

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 proposals dossier for each case; and other documents 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 22 October 2014.

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: Permission be granted subject to conditions.

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

Classification: Unrestricted

Deferral and Members' Site Visit

1. At the Planning Applications Committee meeting on 6 November 2013 Members resolved to defer a decision on the application pending a Members' Site Visit. Accordingly, a group of Planning Application Committee Members visited Gravesend on the 20 January 2014 to familiarise themselves with the site and surroundings and issues arising from the proposal. The Democratic Services Officer's notes of the visit are attached as appendix 1. Since the Site Visit the applicant has made some changes to the proposal, where necessary has revised supporting information and has provided further clarification regarding some aspects of the proposals as set out below.

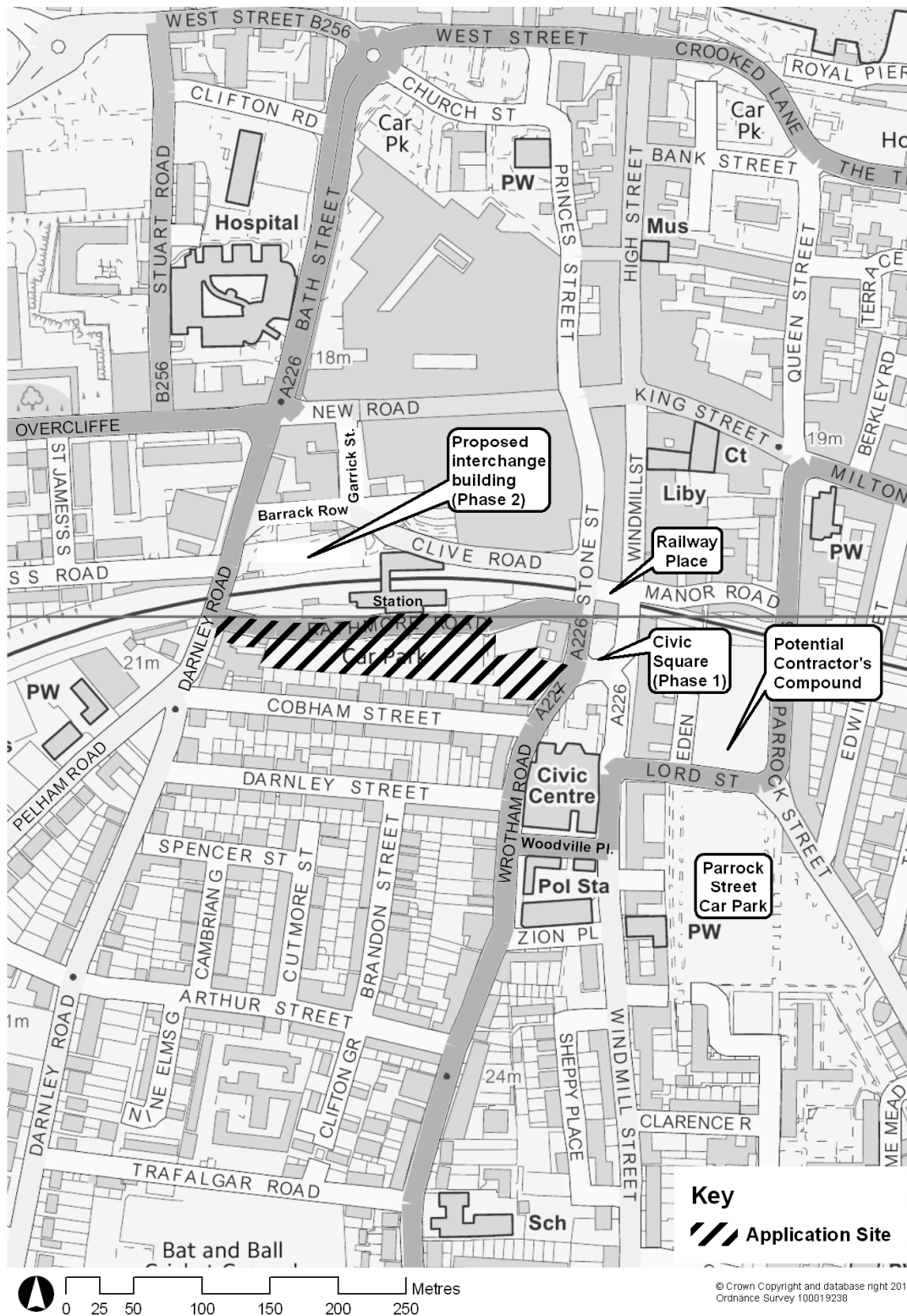
Site

2. The application site lies to the south of Gravesend railway station. It comprises an area of land 0.95 of a hectare (2.35 acres) which includes Rathmore Road, the public car park of 225 spaces to the south (owned by Gravesham 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.
3. 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. On the south 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 there are advertising hoardings on the side walls to 13 Darnley Road and 24 Stone Street.

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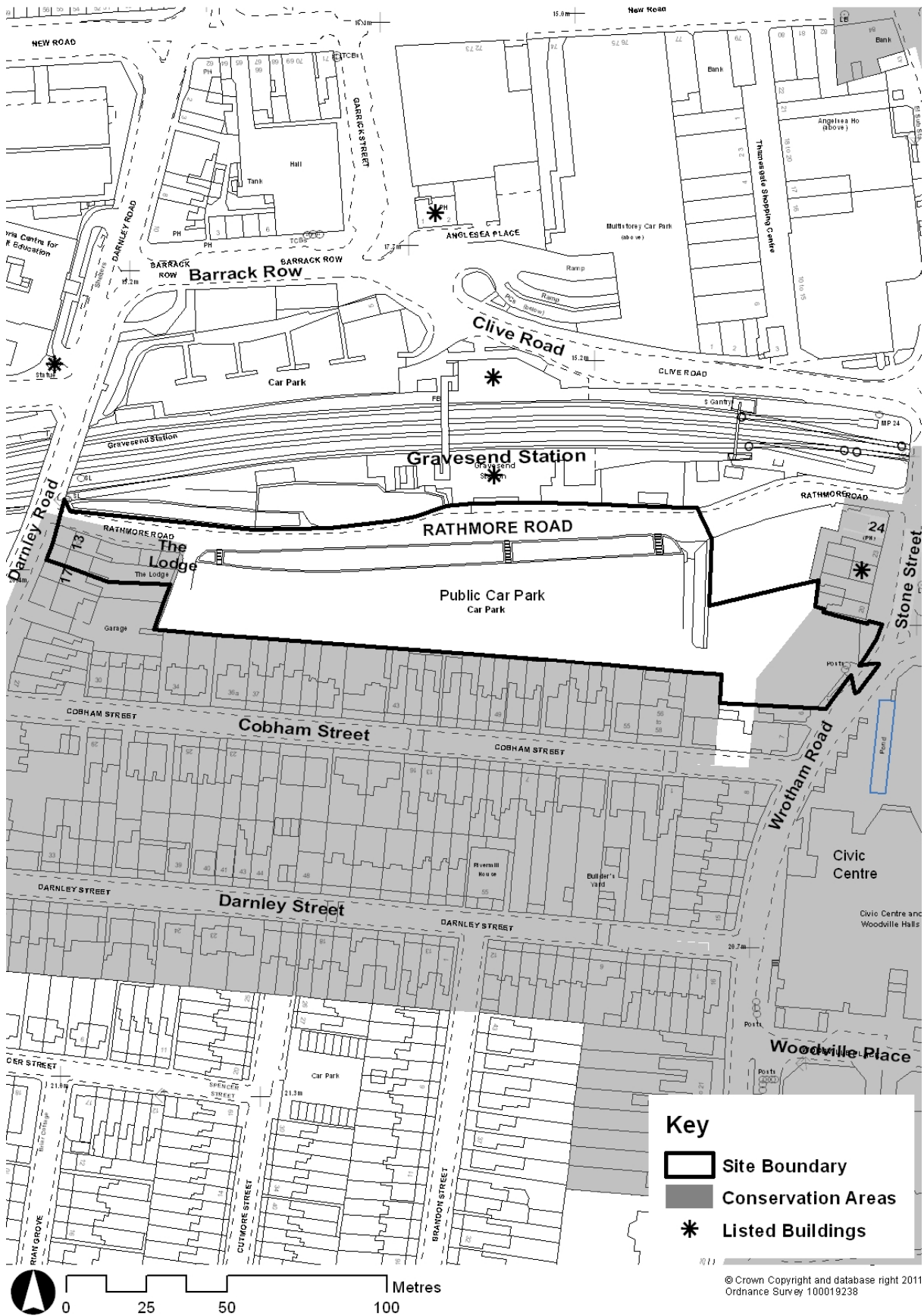
- The application site is partly within and otherwise adjoins or is close to the Darnley Road and Upper Windmill Street Conservation Areas. Gravesend Railway Station building to the north and numbers 20–24 Stone Street to the east, a small terrace, are Grade 2 Listed Buildings.

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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Ordnance Survey 100019238

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

Background, Relevant Planning History and Proposal

5. 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 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.
6. The application was submitted in the context of *'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 (2518.75 square feet); 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.
7. The aim of the Gravesend Transport Quarter Master Plan has been 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.
8. The intention has been for the Master Plan to be implemented in phases. Phase 1 which included the creation of the Civic Square was completed in November 2011.
9. The erection of an interchange building providing a car park with 396 car parking spaces, retail/office units and bus interchange on Barrack Row was 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.
10. 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 250 metres (about 820 feet) 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 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

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provides the most direct route possible between Wrotham Road and Darnley Road, designed to ensure minimal disruption to existing, neighbouring residential and commercial boundaries.

11. 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. *This expired in January 2014. However, since 1 October 2013 the requirement to obtain Conservation Consent has been abolished as a consequence of the Enterprise and Regulatory Reform Act 2013 and provision made that planning permission will be required instead. In that respect, it will be noted that planning permission is being sought for these demolitions as part of this current application.*
12. 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 (now with a retaining wall - see below), as a result of the varying 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 now proposed that the area of the car park unaffected by the construction of the road would be retained for car parking (see below). 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 24 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 Civic Square. Proposals for street lighting include 8 metre columns along the road and footways, and 10 metre columns outside the station.
13. 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 and now also with a shared footway/cycleway on the north side (see below). 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.
14. 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.
15. The applicant stated in the application 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 had outline permission for residential and retail/office development as indicated in paragraph 6(c) and (d) above. *It is now proposed to be retained for car parking (see below).*
16. Although at the time this application was submitted proposals for a scheme to widen and realign Rathmore Road benefited from outline permission, as referred to in paragraph 6 (b) above, a fresh application was submitted, rather than an application for approval of reserved matters. That was 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

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on behalf of) the County Council as Highway Authority and therefore falls to be determined by the County Planning Authority. The applicant advised that these changes from the outline scheme included the following:

- 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 24, 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.

17. 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.

18. 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 received August 2013

19. 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 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) included:

- A revised scheme plan which showed amendments to the permitted development area at Clive Road bus gate 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 were 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.

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Amendments received April 2014

20. Following the Members' Site Visit on the 20 January 2014, the applicant notified me in February that it was intended to submit revisions to the application for the following reasons:
- Gravesham Borough Council's intention to have car parking on their retained land and the associated access and scheme implications.
 - To address concerns expressed and provide further clarification regarding the impact of the scheme.
21. Revised drawings together with supporting documents amending the above planning application were received in April following which further consultation, notification and publicity has taken place. The amendments include:
- Part of the Rathmore Road car park is proposed to be retained as a remodelled car park with 65 spaces including 5 disabled spaces with an in/out access in a similar position to the existing car park entrance.
 - In order to maximise the amount of land available for an effective car parking layout to be provided, a low retaining wall has been incorporated at the back of the proposed southern footway to the new road. This increases the extent of the retained land. The retaining wall varies in height but is less than 1.4m (the threshold beyond which it would be defined as a highway structure). The surface area of the earth slope between the retaining wall and the acoustic noise fence would be slightly reduced but the applicant states that there is sufficient space for planting to help screen and break up the visual appearance of the acoustic noise fence. Revised planting details for the slope have been submitted. It is also stated that the concept of the retaining wall is consistent with the existing situation that has a retaining wall of similar height and gives an opportunity for adopting a material and finish to enhance the townscape of the area in front of the station.
 - A pedestrian ramp, designed to meet the requirements of the Disability Discrimination Act 1995 is proposed at the Wrotham Road end of the car park to connect to the proposed Toucan crossing on the new Rathmore Road. The ramp would allow easy access by pedestrians from the car park to the railway station and town centre.
 - Minor realignment to the noise barrier is proposed incorporating two gaps to accommodate the car park access and pedestrian ramp. The applicant states that the implications for the residents locally in Cobham Street and Darnley Road of these breaks in the continuity of the noise barrier (which have been considered in a revised noise assessment) are not considered significant.
 - The shared cycleway/footway between Darnley Road and the railway station is shown to be removed and proposed to revert to pedestrian only footway.
 - Part of the old Rathmore Road is proposed to be designated as shared cycleway/footway to provide better connectivity between the town and railway station.
 - Cycle markings are proposed at the Wrotham Road/Rathmore Road junction to guide cyclists onto the shared cycleway/footway along Rathmore Road.
22. In addition the following amendments are proposed to the related works outside the application boundary which are proposed to be carried out under permitted development rights:
- The two bus stops in Clive Road between the railway station and Thamesgate shopping centre entrance are proposed to be relocated to Barrack Row to bring the bus stops/routes together with those already located in Garrick Street. The footway width would be increased to 3.3 metres (10 feet 10 inches) wide on the south side

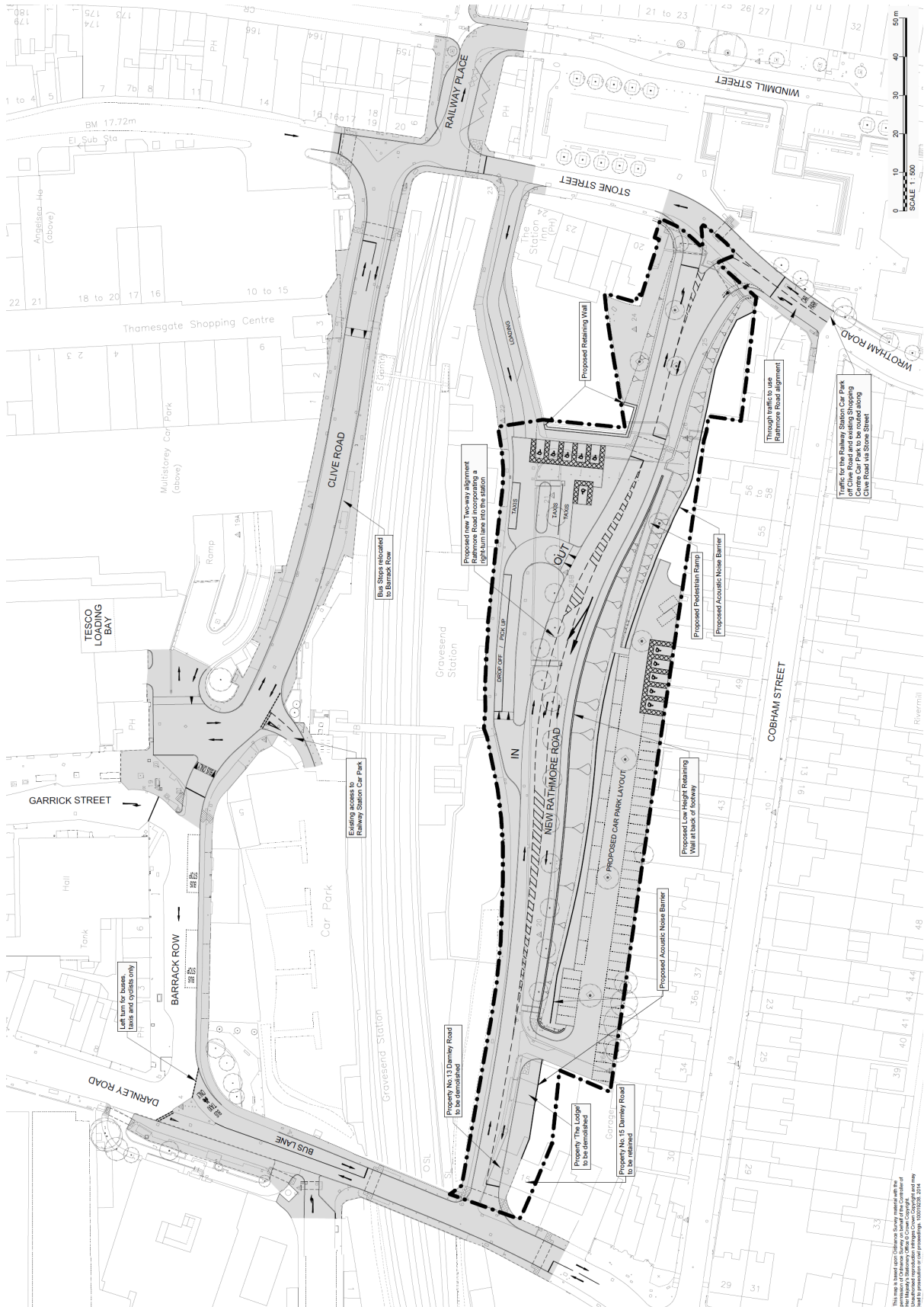
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- of Barrack Row to provide room for shelters at the back of the footway and to maintain continuity of the footway in front.
- The bus lane on Darnley Road is now shown for use by buses, bicycles and taxis.
23. The revised drawings and supporting documents amending the application include a report which identifies the changes to the scheme and supporting information as well as clarifying some aspects of the application. It highlights the following benefits of the scheme to Gravesend town centre:
- Would maintain the town centre one-way system in a more direct and simpler manner.
 - Would provide additional road space and by making the new Rathmore Road two-way would give greater flexibility for vehicle movements in this part of the town centre.
 - Would enable Clive Road to be maintained exclusively for buses, local delivery vehicles and traffic to and from existing and proposed car parks.
 - Would remove the severance caused by traffic on Clive Road between the railway station, Thamesgate shopping centre and town centre creating an improved pedestrian environment.
 - Would exclude through traffic from Barrack Row and enable public transport to be moved to a single location giving the opportunity for a future interchange.
 - Would provide an enhanced environment and facilities at the Rathmore Road railway station entrance.
 - Would provide public realm improvements through the use of granite paving materials complementing the new Civic Square.
24. The applicant states in the report that the scheme was identified as Phase 3 because it had originally been expected that Phase 2 would proceed in advance. However, Phase 2 has been delayed and whilst the scheme remains part of the overall Gravesend Transport Quarter Master Plan, it is now being promoted as a 'standalone' scheme because of the current uncertainty about the timing of Phase 2, which is outside of the control of the applicant. The applicant also states that there is no direct linkage between the scheme and Phase 2, although there are implications for each depending on the timing of the delivery of each phase. On the one hand, Phase 2 proceeding in advance of the scheme would provide replacement commuter parking but existing traffic would have to be accommodated through the public transport interchange. On the other hand, the scheme would remove through traffic from Barrack Row and ease the construction of Phase 2 but replacement commuter parking and the public transport interchange would follow later.
25. The revised drawings and supporting documents amending the application also include: a Noise and Vibration Addendum; Heritage Statement Addendum; revised scheme plans; revised cross sections; and drawings showing revised landscape proposals for the cut in slope and related cross-sections.

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

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Scheme Plan showing application boundary



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

Cross Sections 1 to 3



1	Retaining wall	VMS	MM	17-03-14
Rev	Revision details	Chkd	Appd	Date
Drawn:	TMW	Prepared		
Chkd:	MM	For comment		
Appd:	MM	For tender		
Date:	19 Sept 2013	For construction		
		As constructed		
		Other		

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Transport

Client

Project Name
Gravesend Transport Quarter

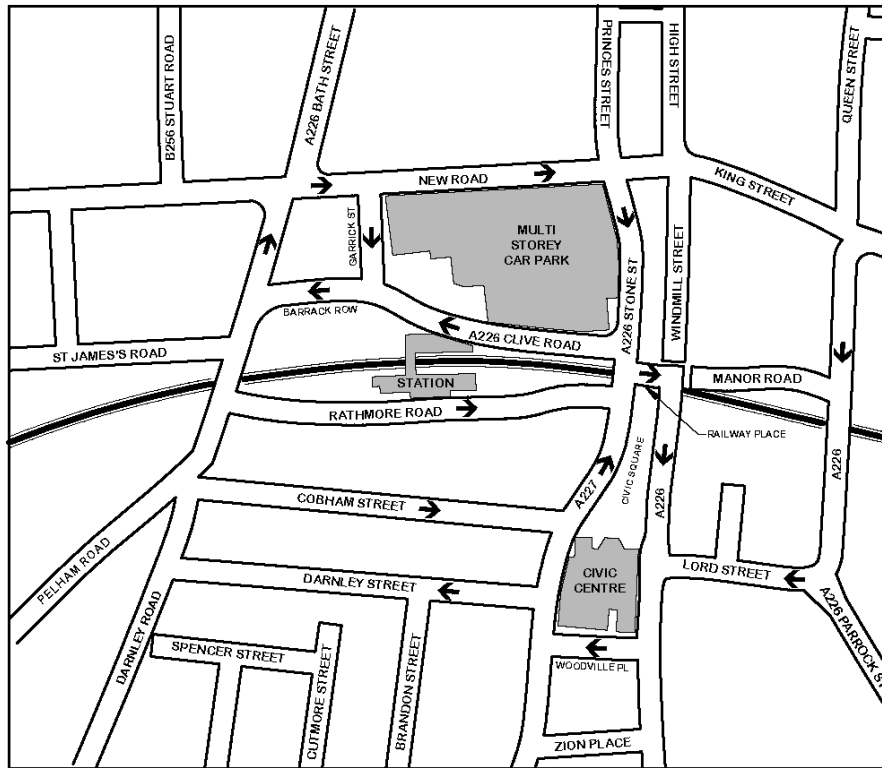
Drawing Title
New Rathmore Road Cross Sections Sheet 1 of 2

Original Dwg Size: A3
Dimensions: -
Scale: As Shown
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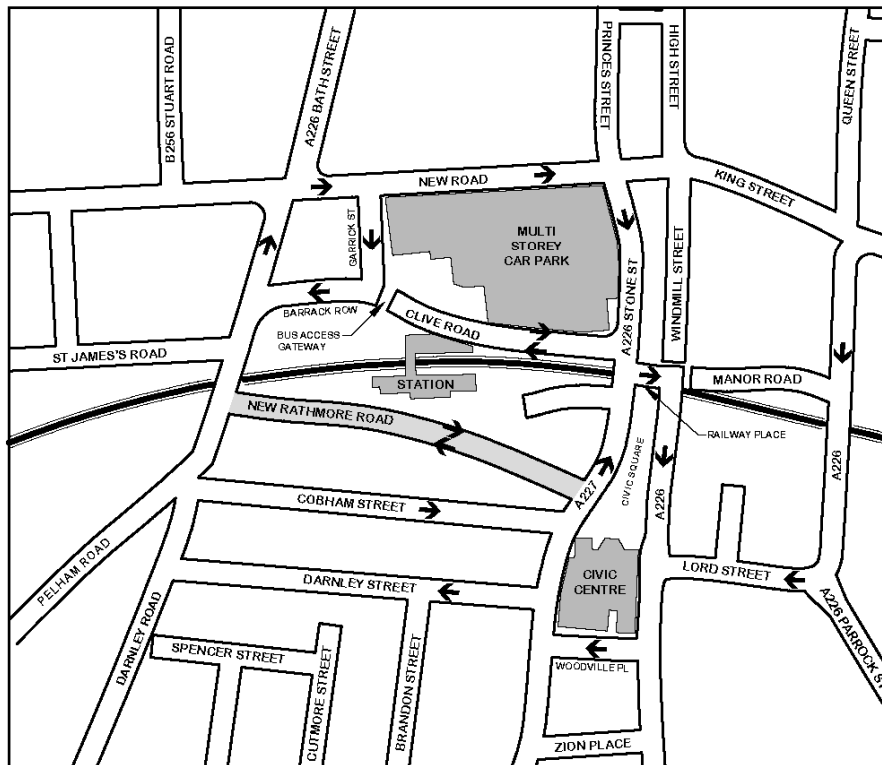
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EXISTING ROAD LAYOUT



PROPOSED ROAD LAYOUT

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

Planning Policy

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

- (i) **National Planning Policy Framework (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 the saved policies have been replaced in whole or in part by policies in the Gravesham Local Plan Core Strategy as indicated in brackets.*

Policy TC0 General Townscape Conservation and Design. *[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. *[Continues to be saved and will be reviewed as part of the Site Allocations and Development Management Policies Development Plan Document.]*

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. *[Continues to be saved and will be reviewed as part of the Site Allocations and Development Management Policies Development Plan Document.]*

Policy TC5 Archaeological Sites. *[Replaced by: CS09 Culture and Tourism and CS20 - Heritage and the Historic Environment.]*

Policy TC10 Landscaping. *[Replaced by: CS12 Green Infrastructure and CS19 - Development and Design Principles.]*

Policy T0 General Transport. *[Replaced by: CS11 – Transport.]*

Policy P1 Public Car Parking in Central Gravesend: Seeks. *[Replaced by: CS11 – Transport.]*

- (iii) As a result of the adoption of the Core Strategy referred to below it was agreed by the Borough Council that **Gravesham Local Plan Second Review (Deposit Version) 2000** should no longer be used as a material consideration for development control purposes.

- (iv) **Gravesham Local Plan Core Strategy** was considered by an independent Inspector at Examination hearings in September 2013. The Council consulted on main and minor modifications to the Core Strategy from December 2013 to January 2014, after which the Inspector held additional Examination hearings in April 2014. The Planning Inspector's Report was received on the 22 July and concludes that subject to the inclusion of a number of main modifications the Local Plan Core Strategy is sound, provides an appropriate basis for the planning of the Borough to 2028 and should be adopted. The Core Strategy and Policies Map were formally adopted by the Borough Council at a meeting of the Full Council on 30 September 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 (as adopted September 2014) are as follows:

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- 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.
- Land required for the possible future extension to crossrail and to protect High Speed 1 is safeguarded under this policy which states that proposals that would prejudice these will be refused. *The Policies Map shows that the railway land and station to the north of Rathmore Road is safeguarded for crossrail safeguarding. The notation also includes a small section of the existing Rathmore Road at its eastern end which under the current proposals is to be retained for cycle and pedestrian use.*
- 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) safeguarding amenity, including loss of privacy, daylight and sunlight of its occupants and those of neighbouring properties and land, and avoid adverse environmental impacts in terms of noise, air, light 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 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.

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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**27. 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 I 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.

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.

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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.

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

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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 and applicant’s response to the matters raised above received in August 2013:

“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.

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.

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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 do not 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."

The Borough Council made the following comments in response to addendums to the noise and air quality reports, and a soft landscaping, scheme received in October 2013:

"In terms of the noise addendum, a recommendation of that report is that noise monitoring is undertaken at 1-4 Cobham Street, 6A Wrotham Road and 15 Darnley Road during the construction phase to confirm, or otherwise, the predicted noise levels. GBC would advise that were the levels to be higher than predicted then the local authority should be advised and an investigation carried out by the contractor in order to demonstrate best practicable means are being employed to reduce construction noise to a minimum.

Turning to the air quality addendum, it is positive that reassurances have been given as to the commencement of monitoring at the identified locations in order to better inform the process and thus assist in deciding the best form of mitigation. However, the fallback reliance by the applicant on the Land Compensation Act for claims by affected property owners is queried as I am advised [the Borough Council considers] that this legislation does not cover adverse impacts on air quality.

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The submission of a soft landscaping scheme prior to determination is welcomed. The scheme principally includes the planting of native trees (mix of English Oak, Common Beech and Silver Birch) along the line of the grassed bank to the south of the realigned Rathmore Road. Coupled with the extensive low level planting proposed this appears to be an adequate solution to 'soften' the street scene and in particular reduce the potential dominance of the acoustic barrier. It may however be prudent at this stage to seek assurances from the applicant that these trees will be suitable for planting on what will be a relatively steep slope. GBC would encourage the imposition of a planning condition requiring approval of the size of the trees to be planted as well as arrangements for aftercare, including the standard requirement that any trees that fail within the first five years are replaced by the developer."

The Borough Council has made the following further comments below regarding the amendments received in April 2014:

[It comments first that that it does not comprise a consolidated response, so relevant comments previously offered by the Borough Council remain.]

"Although submitted as a stand-alone application, "when originally submitted in May 2012 this scheme gave effect to the outline approved Transport Quarter Master Plan to realign Rathmore Road which formed part of the on-going delivery of this wider vision. Whilst this outline planning permission has now expired, the Borough Council remains supportive of this application which will provide improved connectivity to the Town Centre and be fundamental to realising the longer term aspiration of providing a public transport interchange adjacent to the train station. Furthermore, an important component of this scheme is that the surface materials tie in with those used on Community Square, which formed the first phase of the Transport Quarter Master Plan.

The principal change to the application is that part of the existing Rathmore Road car park will be retained, with pedestrian and vehicular access achieved by realignment of the acoustic barrier to incorporate gaps. The retention of 65 public car parking spaces (which includes 5 disabled spaces) is a welcome response to local objection regarding loss of town centre parking. The 2012 Regulatory Board report considered the future of the residual land (now proposed to be retained as car park), and it is considered that the proposed retention of a smaller car park meets the expectations of the Council in that regard.

It is prudent to recognise that the retention of this existing section of public car park would not prevent consideration of the site for alternative uses in the future, particularly since access to the land is retained.

An updated noise assessment has been undertaken to account for two gaps in the acoustic fence and conclusions that it will not generate adverse noise effects are accepted by GBC. The minimal increase in noise levels at the properties in Cobham Street is considered to be outweighed by the public benefit of retaining part of the car park.

The noise report reiterates previous findings that the property most adversely affected will be 15 Darnley Road and the applicant recommends that they acquire it and convert it from residential to commercial so that the effects are less sensitive. As previously advised concerning air quality mitigation for the same property, such mitigation would require planning permission in its own right and any application would be determined on its individual merits and having regard to local planning policy. This requires adequate

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safeguarding through planning condition, and it is recommended that relevant planning permissions are sought in advance of any works commencing. For the avoidance of any doubt this does not fetter the Borough Council in the determination of any subsequent planning application.

The noise report also advises that post-construction noise monitoring is no longer required due to remodelling concluding that effects on 1-4 Cobham Street and 6A Wrotham Road are not significant and that it intends to acquire and change the use of 15 Darnley Road. However, the report highlights 17 Darnley Road as being eligible for noise insulation and so the Borough Council advises that post-construction monitoring at this location is necessary, unless further justification is submitted confirming otherwise.

The amended application acknowledges that Conservation Area Consent (CAC) for the demolition of 13 Darnley Road and The Lodge has now expired. However, the recent abolition of the CAC procedure allows the current planning application to be upgraded to include assessment of this matter under single cover. The Borough Council reiterates the request for this building's recording and architectural salvage - it may be expected that salvaged exterior features are incorporated into 15 Darnley Road, over which there will be control by the applicant as they intend to purchase it, or offered to the owners of adjacent buildings in the terrace for incorporation into their properties. It will also be important to impose a planning condition prohibiting demolition until such time as a contract is let for the construction works.

Whilst the extent of soft landscaping is reduced due to less available area for planting, it is noted that the same quantity of 'feature' trees remain (mix of 25 English Oak, Common Beech and Silver Birch) along the grassed bank to the south of the realigned Rathmore Road. The Borough Council retains the view that the soft landscaping appears to be an adequate solution to soften the visual impact of the acoustic barrier and contribute to the setting of the listed train station, subject to adequate arrangements for aftercare. The inclusion of a retaining wall raises no adverse comment, although use of a material sympathetic to the area is important.

In conclusion it is considered that the proposed retention of a reduced and remodelled car park, together with the associated changes to acoustic fencing and landscaping, are positive. The properties in Cobham Street will benefit from reduced nuisance from improved modern lighting as a consequence of the remodelling of the car park, whilst retaining this part of a key town centre car parking facility.

The changes to the cycle and footway access provide a better balance between the interests of cyclists and disabled, and meets a concern of the Gravesham Access Group."

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.

The Environment Agency has no comments to add regarding the amendments received in April 2014.

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

“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.

English Heritage has no comments to add regarding the amendments received in April 2014 and confirms their advice remains as previously stated.

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

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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 in August 2013, KCC Highways and Transportation - Development Planning Manager commented as follows:

“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 Gravesham 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.”

With regard to the amendments received in April 2014, KCC Highways and Transportation - Development Planning Manager has commented as follows:

“These proposal plans are similar to those which were commented on previously in respect of highway matters when no principle objections were raised on the basis that any outstanding technical detail issues could be picked up through the subsequent post planning detailed highway works approval process. As such the following comments relate specifically to the elements of this proposal which have since been altered or to issues which have arisen as a result of those alterations:

Initially, note is made of the proposed retention of part of the existing Rathmore Road car park via the existing western access to the current facility. Whilst town centre parking management and parking provision in general is a matter for the local planning authority, Gravesham Borough Council, the proposed retention of this parking provision is nevertheless seen as a highway benefit as it serves to partially off-set the loss of future provision resulting from the postponement and delay of the Phase 2 Transport Interchange building and car park element of the overall Transport Quarter proposals.

In respect of the amended highway elements of this layout proposal it is first noted that the proposed shared cycle/footway facility on the north (east bound) side of the proposed Rathmore Road west of the station entrance has reverted to a footway only with cycle movements now expected to be via the adjacent east bound carriageway. Whilst it is normally preferable to secure a dedicated facility for cyclists or shared pedestrian/cycle facility it is recognised that in this instance there is likely to be a high pedestrian footfall due to the adjacent station entrance with low projected east bound vehicle flows and so an on-street solution for cyclists here would not constitute a safety concern. Furthermore, there is no significant scope to further widen the footway over much of the length of Rathmore Road due to existing physical constraints locally and so no objection is raised to this amendment.

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Secondly, whilst there is no principle objection to the proposed introduction of an additional shared footway/cycle facility along the retained eastern limit of the existing Rathmore Road, it is noted that there is the potential for conflict to occur between cyclists, pedestrians and vehicles at the western end of this facility where it links to the station access road. It is accepted that such conflict can be managed through the final detailed design solution for this area as a whole and whilst no principle objection is therefore raised it is nevertheless recommended that particular emphasis be placed on the need at the detailed highway works approval stage to manage conflict in this area in respect of both the most recent alterations to the cycle facilities and also in respect of vehicles exiting the old part of Rathmore Road in a westerly direction, vehicles using the station access road and vehicles/taxis entering or exiting the taxi stacking and disabled parking area to the east of the station access road.

As a further general point of note the current scheme has been subject to a number of significant amendments since the original design was carried out and an associated Safety Audit completed. Whilst the absence of a Safety Audit of the highway proposals prior to a planning decision being made would not constitute reason for raising formal objection to a planning proposal, it is generally recommended where significant highway works are being delivered via a planning proposal that a Safety Audit to Stage 1 minimum be carried out in advance of a planning decision being made. This is in order to avoid the potential for such an Audit carried out post-planning to identify issues which cannot be resolved without altering the permitted planning layout.

It is accepted in this case that many of the alterations which have been made to the original scheme are detailed arrangement issues which will be assessed at the post planning detailed design stage through a Stage 2 Safety Audit but note is made that some alterations have occurred in respect of the principal arrangement which will also require the original Stage 1 Audit to be updated so as to reflect the current proposal - specifically in the vicinity of Barrack Row where the general arrangement has been altered to reflect the postponement of the Phase 2 transport interchange works. Therefore, whilst no principle objection is raised in respect of the absence of an updated Stage 1 Safety Audit, we would continue to give an advisory recommendation that an updated Safety Audit be carried out to Stage 1 at the earliest opportunity to reflect the current proposals.

Finally, note has been made that the location of the 'bus gate' facility between Clive Road and Barrack Row may result in the potential for the gate feature to potentially be bypassed via the A.W. Commercials forecourt to the south and for conflict to be created between the gate feature, the A.W. Commercials access and pedestrian movements via the pedestrian crossing at this locality. It has subsequently been confirmed that the gate feature will in fact be a traffic signal arrangement without a physical gate which will overcome the safety concern relating to vehicles potentially seeking to bypass the feature via the adjacent vehicle crossover and hardstanding area and no principle objection is therefore raised. However, note should be made that the final detailed design arrangement in respect of this feature will need to address the issue of maintaining vehicular access to the A.W. Commercials building without increasing pedestrian/vehicle conflict in close proximity of the pedestrian crossing facility.

In conclusion, no principle highway objections are raised in respect of these proposals but we would continue to recommend that the advisory points raised above be addressed at the appropriate time.”

The updated Stage 1 Safety Audit has now been carried out. Although some issues were raised by the auditor the Development Planning Manager (Highways and

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Transportation) has confirmed that he is satisfied with the proposed actions or otherwise of the scheme designer in respect of addressing them.

KCC's Noise Adviser

The comments, detailed in my report to the Committee on 6 November 2013, relating to the Noise and Vibration Assessment March 2013 and subsequent Addendum are no longer relevant, as it has been superseded by the Noise and Vibration Addendum submitted in April 2014. KCC's Noise Adviser has commented on that as follows:

Construction Phase

"The assessment does not predict likely construction noise and/or vibration levels as a result of the proposed development and it is considered that failure to quantify construction noise levels is a significant omission within the report.

In order to enable the impact of construction noise to be properly assessed, predictions of noise and vibration from each phase of the proposed construction works should be provided."

Operational Use of the Scheme

"The assessment has more accurately modelled the junction of New Rathmore Road, Wrotham Road and Stone Street, which has reduced the number of properties predicted to experience a significant adverse effect. The remodelling undertaken has used reasonable assumptions and therefore it is considered that it is likely to provide more accurate predictions of traffic noise.

The assessment concludes that the scheme is slightly beneficial. In the long term there is one property that will experience a significant adverse effect, and seven properties that will experience significant beneficial effect. The property that is predicted to experience the significant adverse effect is being purchased as part of the scheme, and will no longer be residential.

The scheme is unlikely to give rise to significant noise impacts during operation."

KCC's Air Quality Adviser 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."

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

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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 overriding 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 subsequently addressed these matters in an addendum. KCC’s Air Quality Adviser accepted the responses given, considered that the mitigation measures should be covered by condition, and had no further comment to make.

With regard to the amendments to the Scheme received in April 2014, KCC’s Air Quality Adviser considers that some further assessment should be required to take account of the effects of the retained car park and relocation of the bus stops on Air Quality.

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 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.”

With regard to the amendments received in April 2014 the Conservation Architect commented as follows:

As previously advised the following will need conditioning in respect of recording, materials and design:

The demolition of 13 Darnley Road has been accepted in the previous approved planning application. The following need to be conditioned:

A level 3 survey in accordance with English Heritage “Understanding Historic Buildings *A guide to good recording practice*” The north gable wall of number 15 should be faced in brick, Flemish bond, in a brick sample to be approved (Smeed Dean London Stock being the most appropriate new brick, but reclaimed brick from careful demolition of number 13 would be preferable).

The retaining walls should be in a yellow stock brick, as above, and either in English Garden wall bond or Flemish bond.

The quality of paving materials referred to as high quality should be conditioned. Comments that the most appropriate materials to the setting of the listed railway station are York stone and granite kerbs of British origin (Cornish/Scottish granite being the most appropriate). However raises no objection to the proposed materials matching those used for the Civic Square.

Also comments that the primary objective for the planting would preferably be indigenous specimen hedgerow planting with the ability to screen the acoustic barrier which would dominate the setting of the listed railway station and this part of the Conservation Area.

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

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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 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

28. 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 in

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August 2013 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 (Gravesend East division) were notified on the 30 August 2013. They were also notified of the amendments received in April 2014 on the 25 April 2014.

Publicity

29. 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. The amendments received in April 2014 were also subject to further publicity which included advertisement in a local newspaper, the posting of 8 site notices and the individual notification of 122 neighbouring properties (being those adjoining the proposed scheme and car park). In addition all other people/parties who had previously made representations were notified of the amendments.

Representations

Representations received in response to the original publicity and notification

30. 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 residents who are home during daytime hours.
- 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

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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.
- 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.

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- 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 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 Gravesham 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.

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- 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.
- 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.

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- 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.
- 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.

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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.

Representations received in response to the additional/amended details received in August 2013

31. 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.

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

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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 Street 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 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.

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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.
- 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.

Representations received following publication of the November 2013 Planning Applications committee report

32. Further representations were reported verbally or circulated to Members at the committee meeting on the 18 November 2013, including the following:

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Nearby local businesses

- A petition with 5 signatures from Traders in Railway Place & Windmill Street the text of which is attached appendix 2.

A representation with no address given

- An email stating that they object strongly to the proposals, as it is considered that they do not represent value for money, cut down on disabled parking and do nothing to make the town more accessible, do not consider the flow of traffic as planned is a good idea, and ask that the scheme be thrown out.

Urban Gravesham

- A letter from Urban Gravesham which was circulated – appendix 3.
- A letter written on behalf of Urban Gravesham raising some legal questions, and our response which were circulated at the Planning Applications Committee meeting of 18 November 2013, attached as appendix 4.

Representations received after the November 2013 Planning Applications committee meeting

33. A number of further representations were received following the committee meeting which include the concerns and objections to the proposal summarised below:

Nearby residents

- Is concerned about higher noise assessed by the applicant at his property and with no housing development now proposed to provide a shield noise would be a real problem.
- The loss of the car park is unacceptable to residents and all users who would now struggle to park. The Borough Council failed to factor in the impact from the loss of the Lord Street multi-storey car park after which chaos ensued and this would be worse.
- The loss of existing trees is completely needless and would ruin the area. The dead space between existing properties and the new road would become a magnet for gangs of youths to hang around upon.
- The Scheme has been stripped of its previous benefits and is now needless and damaging.

A nearby local business

- Concerned that their customers would not be able to use the shop due to the closure of the car park and therefore without customers would no longer be able to afford running the shop and have to close down. Considers that small local business providing a service to the local people of Gravesend should be supported.
- Not only is the closure of the car park a worrying issue for local shops but it would also affect the traffic flow as customers of theirs and other shops would still need to maintain their routine of coming into town and would therefore park illegally. That would cause huge congestion, is now likely to affect the disabled parking on Railway Place and therefore take this privilege away from people who really need it.

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Other Gravesend residents

- Strongly objects to the proposal because of the resultant loss of station parking. To lose this facility, without any compensating parking areas being made available would make life for commuters much more difficult than it already is. People would have to park further away from the station, surrounding roads are restricted in the times that you can park there (i.e. not a full day) which would result in a long walk from parking places to the station.
- Considers that, there are surely, planning laws that deal with the Council's requirements to provide suitable parking facilities at transport hubs such as stations. Has parked in this car park for years, states that he has never been made aware of any plans to develop it. Queries what consultations have been undertaken and suggests that if there have been they were probably surreptitious.
- Concerned about where the cars would be parked, the possibility of on-street parking and further roads having to be made one-way as a result.
- The proposal is entirely against the grain of recent developments, including the Community Square, the aim of which is to render the town centre a people-friendly environment. We need to cancel this and look forward to a car free shopping and strolling experience.
- Considers that to change the road layout and traffic flows would be a mistake and requests that mistakes of the past are not repeated in the name of progress, or convenience, or increasing shopper footfall.
- A registered disabled user is concerned about the loss of the car park and the detrimental effect it would have on the freedom and quality of life for disabled users that need easy access to the station, particularly as they do not understand what benefits the Scheme would bring to any one at all.
- Concern is also raised on behalf of a paraplegic driver who uses the car park as it has one of the few wheelchair parking spaces with flat access on the driver's side which he needs.
- Considers the proposal to be a waste of public money which could be better spent in the town centre and help with the regeneration of the town across a wider area.
- The proposal would close a vital station car park, divert traffic through the town square where a conflict between pedestrians and traffic would occur and with the loss of disabled car parking inconvenience some of the most vulnerable in society.
- The community square would become polluted and noisy.
- The proposals would likely cause congestion to the south side of the station delaying all trips. Diverted large lorries from Tesco are a real risk to commuters, rushing through this area.
- Considers that it is an ill thought out plan which has been pushed through by the Borough and County Council without any master planning, piecemeal and lacks any foresight for Gravesend.
- Considers that the whole ethos of the 'transport quarter' has been superseded and that permission should not be given without full consideration of the best solution for the town and people of Gravesend.
- Hard pressed commuters would need to park further away making their daily lives more difficult and longer.
- The proposals do not respect the heritage of the area.
- Considers that the major problem with traffic in the area is caused by the buses stopped at the bus stops in Clive Road. Suggests that if Garrick Road and the top end of New Road were made 2-way for buses only, the Clive Road bus stops could be relocated there without disrupting the whole town and would save a lot of money.

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Residents living outside of Gravesend

- The first time she heard of changing the traffic around the town centre was from a leaflet placed on her car that was parked in the Rathmore Road car park. Concerned at loss of car parking spaces including disabled spaces close to transport links. She relies heavily on the car park as she commutes to London and another car park 5 or 10 minutes away would be impractical.
- Loss of spaces would also lead to a loss of footfall in the town centre.
- Concerned about directing additional traffic around the community square.
- Closure of the car park would mean people would not come into Gravesend.
- The car park is convenient for disabled users going into the town and Civic Centre and should not be closed.
- Comments that during the period over Christmas 2013 when the Rathmore Road car park was closed, it was evident that the Lord Street car park did not have capacity to accommodate the displaced vehicles. On two occasions when arriving before 09.00 she could not find a vacant space. Also, comments that parking on the street anywhere within 5 square miles radius of the station is restricted to residents.
- There is currently no viable public transport service that allows residents who live on the outskirts of Gravesend to travel to the railway station.

Representations with no address given

- It would be a huge loss to lose this car park which is where most commuters park as the station car park has few available spaces leaving the only reasonably priced car park for commuters as Lord Street.
- Is concerned about the closure of the car park, introduction of a two way road, demolition of a Georgian House, and the combination of both a pedestrian footway/cycle way.
- The scheme should be re-visited before any funds are committed to the project.
- An employee of a local business and regular user of the car park wishes to voice objection to the proposal to close the car park as part of the regeneration of the town centre. Asserts that, surely, the purpose of the regeneration is to encourage more visitors to the town, yet it would be more difficult and less convenient for visitors. To close a car park in such close proximity to the station, especially one used in the main by commuters, employees of town centre businesses and disabled and elderly shoppers is, in her opinion, senseless.
- Questions how the amount of money can be justified when there is no sensible, safe and pleasant outcome.
- The loss of 242 parking spaces without alternative provision is ill conceived given the increase in rail passenger capacity/use of Gravesend railway station and would be exacerbated when development of Stone Quarry development commences and rail passenger numbers increase. It would significantly increase traffic congestion with large numbers of commuters being dropped off picked up. It would also affect the viability of local shops if shoppers cannot use this car park.

Gravesend Access Group

- Concerned that the footpaths would be for use by both pedestrians and cyclists. As a member of Gravesend Access Group, comments that she is aware that any shared surfaces are highly dangerous for people with disabilities, such as impaired sight, hearing and mobility. Wishes that this issue be given proper consideration in the ongoing planning.

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- Comments that the Access Group already has concerns about the loss of disabled parking bays from the Rathmore Road car park and that the suggested site for replacement bays does not seem to consider the needs of people who require such facilities.
- The chair of the access group comments that the shared cycle space suggested for Rathmore Road should clearly be segregated by a tactile line and tactile pavement at the start and end of cycle path, as it is dangerous for pedestrians with young children elderly disabled to use the pavement safely.

Gravesend Heritage Association

- Gravesend Heritage Association object most strongly to the proposal:
 - it would result in the loss of a handsome terraced house on Darnley Road junction, damaging effects on Upper Windmill Street and Darnley Road Conservation Areas, and 20-24 Stone Street Grade 2 listed buildings;
 - it would see the incredible situation of HGV's and other traffic being diverted across the main Civic Square after it has just been largely removed; and
 - cannot see what the gains of the scheme would be at all.

Representations received in response to the Members' Site Visit

34. Following the Members' Site Visit the Chairman of the Planning Application's Committee received a letter from two of the Gravesend residents who attended the visit setting out their conclusions and recommendations on the issues that emerged. The letter is attached as appendix 5.

Representations received in response to the further publicity and notification relating to the amendments received in April 2014

35. In response to the further publicity and notification relating to the **amendments received in April 2014** I have received further representations from some respondents that have written in before and additional representations as summarised below. In addition I have received a copy of a further letter from one of the residents referred to in paragraph (34) above addressed to the Chairman of the Planning Applications Committee which was circulated to Members of the Committee by the Committee Clerk on the 16 May 2014. For ease of reference I attach a copy as appendix 6. I have also now received a petition with 86 signatures collected by a café owner on Railway Street the text of which is attached as appendix 7.

Nearby residents

- Objects to the amended application on account of the following concerns:
 - A decrease in air quality due to the increase in traffic volume;
 - Shares the shop keepers' concerns regarding the risks of narrowing the pavements in Railway Place, with the increased traffic due to the scheme;
 - The retention of only 65 spaces within the Rathmore Road car park is woefully short of the current usage and would create a shortage of spaces in the town;
 - An acoustic barrier would be absolutely hideous and spoil the area;
 - The destruction of the green area and trees around the current car park;
 - The increase in heavy traffic around the pedestrian area by the Civic Centre; and
 - The complete failure of the scheme to justify itself worthwhile and necessary compared to the existing set up.

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Nearby local businesses

- Reiterates and repeats previous concerns as summarised under paragraph (33) above.
- Considers that diverting the traffic around Railway Place would have an adverse effect on the safety of pavements and the air quality and noise environment of the Civic Square, drive people away from using and consequently have an adverse impact on all the shops in the area.
- People should be encouraged to visit the town centre but the proposal would have the opposite effect and drive even more people towards Bluewater.
- At the present time traffic flows around the area well considering it is the town centre. There is some standing traffic at peak times but it quickly moves on. The introduction of the extra traffic lights would result in delays not experienced currently.
- Consider that the money could be better spent to improve the public and work areas of the town as well as its roads and general upkeep of the town to make it a pleasant environment to live and work in.
- Concerned about loss of disabled parking with relocation further away from the Windmill/Manor Road junction, which is the gateway to banks, building societies, shops, library etc. Questions its suitability at the bottom of a slope of the existing Rathmore Road making it difficult for wheel chair users uphill and the alternative provision in Parrock Street which is treble the distance to the gateway.
- Concerned at the loss of 150/200 parking spaces, the loss of a Georgian house, the introduction of two-way traffic in Rathmore and Clive Roads, relocating bus stops on Clive Road to Barrock Row away from shops and the introduction of HGV's to unnecessary journeys around the town centre.

Other Gravesend residents

- Objects to the loss of the car parking spaces as it is the main car park for commuters who would not be able to park with easy access to the station.
- The station is evidently getting busier and it makes no sense to close the car park which is well used throughout the day.
- It is suggested that a retaining wall between the road and the car park be provided instead of a slope, to allow more parking spaces to be retained. It is also suggested that it would act as an acoustic barrier and negate the need for another one.
- The proposal meets a tiny proportion of its original aims to create and integrated transport scheme. It has now become a nightmare with every fresh detail emerging.
- The one way system around Gravesend should be considered in one complete project.
- A development proposal which will affect a different part of the one way system has been granted planning permission. It proposes traffic calming along West Street with built out bus stops and extra Puffin Crossings along both West Street and Crooked Lane. These measures will undoubtedly slow the traffic down on this section as that is its aim. This in turn will therefore encourage traffic heading south out of town to go up Princess Street and Stone Street to miss out the remainder of West Street and Crooked lane, thereby creating a short cut.
- The 3 sets of traffic lights within the scheme would each contain 4 phases, 3 individual phases for traffic and 1 for pedestrians. Comments that at any given time at least 66% of the traffic would be prevented from moving by a red light and if the pedestrian cycle is activated it means that no traffic at that junction will move for probably between 45 seconds and 1 minute. Railway Place/Stone Street/Clive Road and Rathmore Road, Darnley would be subject to extra delays. Because of

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the tight turns the resulting stop lines for the lights would be set back many yards from the junction, this would enable large oncoming vehicles to be on the wrong side of the road, through necessity, whilst negotiating the turn.

- Disabled Parking by its mere name should mean that it is situated, if at all possible, on flat level ground not at the bottom of an incline as in this proposal. The thought of an elderly person pushing their husband/wife up the incline of Rathmore Road causes great concern.

A resident living outside of Gravesend

- Objects to demolition of 13 Darnley Road which is part of a locally important historic terraced building, shown on the 1840 tithe map, allegedly dating from the early 1830s and shown on early OS maps as Hutchinsons Place. Comments that, though not listed, this group is locally important and specifically cited as such in Gravesham Borough Council documents relating to the Darnley Road Conservation Area, which states 'The Georgian-style Nos. 13 to 19 Darnley Road are of three-storeys and present elegant, brick faced facades, featuring cast iron balconies, to the road.' He strongly believes that the integrity of the group should be preserved, and some other alternative needs to be sought in order to avoid the demolition of No. 13.

Gravesend Access Group

- The Access Group is against the shared cycle spaces as they should be segregated to make it safe for all pedestrians.

Discussion

Introduction

36. The proposal involves the realignment and widening of Rathmore Road, effectively to create 250 metres (about 820 feet) of new two way highway with footways either side, and shared footway/cycleway at the eastern end only (in the scheme as amended), improvements to the railway station forecourt, together with other consequential or related works (including demolitions), as described in the earlier part of this report. The amended proposal also now includes continued use of the residual land for car parking. 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.
37. 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 (26) above, and other material planning considerations.
38. 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, 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

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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

39. The principle of the new improved section of road has previously been established by the now expired outline planning permission, as one 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 (16) 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 if and when that might be constructed. [Besides which it would now 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 overriding reason why it should have to be in that order. 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.
41. 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 has also been 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. Concerns are reiterated in representations received to the amended scheme, amongst others, that it is being considered as a standalone project. It is considered that it should be presented as a complete proposal encompassing all the elements of the Transport Quarter development so that decision makers can be aware of the total costs and benefits. It is also recommended in the covering letter to the Chairman (appendix 6) that KCC remit the transport hub requirements of Gravesend as part of the Swanscombe Development as a National Infrastructure project to the relevant national planning authority.
42. 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, (which in any event is outside of the applicant's control). 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 now be delivered in the way originally envisaged, this application (as amended) stands to be considered on its merits as submitted, and I can see no reason to delay its determination further.
43. It will be noted that since Members considered and deferred the application in November 2013 that the Local Plan Core Strategy has now been adopted. At the time it was acknowledged that the situation with the Development Plan was not wholly definitive because the adopted Local Plan dates back to 1994 and the final outcome in respect of objections to policies in the emerging Core Strategy were not then known. In the circumstances, I considered the aims and objectives of individual policies and the

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wider aspirations relevant to this application against the NPPF; I concluded that they were consistent with it.

44. The relevant Core Strategy policies then in the emerging Plan remain substantially unchanged in the adopted Plan. Policy CS01 of the Local Plan Core Strategy (as set out in paragraph (26iv) above) reflects the presumption in favour of sustainable development consistent with the NPPF. Policy CS11 (as set out in paragraph (26iv) above) of the Local Plan Core Strategy 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. In my view, the aims and objectives of these policies remain 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.
45. 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 within part of the scheme, 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 cycle and 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 residual land south of the road would now continue in use for car parking. 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 D1.14 indicate changes to the traffic circulation.
46. The benefits of the scheme highlighted by the applicant are set out in paragraph (23) above. 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 Local Plan Core Strategy and consistent with the NPPF guidance for sustainable transport. Taking into account the above factors, I consider that in principle the proposal should be supported on policy grounds alone. 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

47. As indicated in paragraph (19) the Transport Assessment Report submitted in August 2013 is on the basis of the proposed development being implemented in advance of the delivery of Phase 2 for the Transport Interchange building. The Assessment takes

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account of changes to the traffic circulation as a result of the proposals set out in paragraph (45) above and shown on the existing and proposed layouts on page D1.14 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. The summary and conclusions from the Transport Assessment are as follows:

- (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.
- (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.] The Assessment states that at the assumed year of opening (2014) traffic flows on the new Rathmore Road are forecast to reach some 990 vehicles per hour in the AM Peak (72 in 2007) and some 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% in the AM Peak and 50% in the PM Peak] 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 vehicle 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

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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 onto 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.
48. In view that it is now proposed that the residual land would continue to be used for car parking, the redistributed traffic from the existing Rathmore Road to the Parrock Street car park, referred to in paragraph (47(i)) above, would be less than previously assessed. Whilst the Transport Assessment has not been updated to reflect this, it is stated in the report submitted with the amendments that it is not considered it would have any significant effect on traffic flows. In that respect, it has been calculated, on a pro-rata basis from data available in the Transport Assessment, that the effect of retaining 65 spaces represents only 2.5% of the AM Peak period and 6.5% PM Peak period of the predicted flow on the new Rathmore Road.
49. 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. These concerns have largely been reiterated in the representations to the application as amended.
50. 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. In terms of the required change of the respective roads from one-way traffic to two-way traffic, and vice versa, I understand that this would have to be subject to appropriate Traffic Regulation Orders.
51. 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. The applicant has also advised that to assist with pedestrian movement on the crossings, the signals will

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be fitted with detection equipment that would automatically allow longer crossing times for pedestrians, if needed.

52. The applicant has carried out tracking exercises based on a 16.5 metre long articulated heavy goods vehicle (the maximum legal size) to ensure that heavy goods vehicles can safely negotiate Railway Place from Stone Street to Windmill Street and Clive Road to Windmill Street. Diagrams showing these have been provided with the amended details submitted in April 2014 in support of the application. Stone Street to Clive Road has also been included and in response to a request the applicant has also provided diagrams showing the tracking for heavy goods vehicles negotiating the junction of Rathmore Road with Darnley Road, Darnley Road (south to Rathmore Road, Rathmore Road to Darnley Road south, and Rathmore Road to Darnley Road north). These demonstrate that the tracks and overhang of the vehicle body can be safely accommodated.
53. The applicant has previously confirmed that a safety audit of the scheme had been carried out and that further safety audits would take place at the detailed design stage. In response to the views of the Development Planning Manager (Highways and Transportation) to the amendments received in April 2014, the applicant has now had a further stage 1 safety audit carried out to take account of the amendments to the scheme. Some issues were raised by the auditor and the Development Planning Manager (Highways and Transportation) has confirmed that he is satisfied with the proposed actions or otherwise of the scheme designer in respect of addressing them.
54. It will be noted that the Gravesham Access Group is concerned about the proposals for footways with shared cycleway and would wish to see these segregated. I understand that within the available width within the scheme it is not possible to do this. However the applicant advises that a strip of 'textured' paving known as 'corduroy hazard warning surface paving' is normally provided across the footway at the start of the shared surface, so that visually impaired people are warned of the presence of these types of provision.
55. With regard to DfT assessment, approval, management or monitoring, the applicant advises that it is not required because of the source and quantum of the funding. 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.
56. The views of The Development Planning Manager (Highways and Transportation) for the Highway Authority are set out in paragraph (27) above. In addition, I sought his further advice on the issues raised in third party representations following the initial consultations referred to above. He 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 *[now expired as noted elsewhere]* 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

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that particular aspect of this proposal which has been considered in greatest detail from a highway perspective.

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

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scheme which has been approved by the Homes & Roads Partnership as part of a programme of works supporting development across Kent Thameside *[with funding 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.”

57. Notwithstanding the representations that have been made, in the light of the views of The Development Planning Manager (Highways and Transportation) above and those set out under paragraph (27) above, 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, i.e. for all travellers and not just motorists, 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

58. The proposals as originally submitted would have resulted in the complete loss of the Rathmore Road car park and its 225 spaces. However, the amendment to the proposals means that the land not required for the road would continue in use for car parking, although providing only 65 spaces. It will be noted, that representations to the original proposal about 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 have largely been reiterated in the additional representations now received, particularly from commuters, despite the amendment. Policy CS 05 of the 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.
59. 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 which is also the landowner. Further discussions have led to the amendment which would see some use of the car park continue. The applicant has advised that there is known spare capacity in the Parrock Street car park and therefore the balance of current users of the Rathmore Road car park would be able to relocate there. There is also no reason why the delivery of the scheme would prevent Network Rail providing additional station car parking at some later date. The Development Planning Manager (Highways and Transportation) has previously commented on the issue of parking as set out in paragraph (56) above and raised no objection in this respect. In response to the amendment, as set out under paragraph (27) above, he has commented that the proposed retention of the parking provision is seen as a highway benefit partially offsetting the loss of future provision resulting from the postponement and delay of the Phase 2 Transport Interchange building and car park element of the overall Transport Quarter proposals. It will also be noted that, as set out under paragraph (27) above, the Borough Council in its formal views to the amendments comments that the retention of

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65 spaces is a welcome response to local objection regarding loss of town centre car parking.

60. The proposals as originally submitted also gave rise to objections to the loss of and lack of suitable and numbers of replacement disabled parking spaces, particularly for people visiting the town and Civic Centre. Some concerns continue to be expressed in the representations received to the amended proposals about the location, distance and gradients. A total of 23 disabled spaces are affected by the proposed scheme and related permitted development works. The amended proposals include 5 disabled spaces in the retained car park as well as the 6 spaces already proposed between the road and the Railway Station. The applicant advises that the 3 spaces that would be lost from Railway Place have already been provided on Windmill Street as part of Phase 1 of the Gravesend Transport Quarter Master Plan. The net loss of 9 disabled spaces would be addressed by re-provision at the northern (nearest) end of the Parrock Street car park, which is equally convenient and level for access to the town centre as the existing locations.
61. The issues relating to the car parking arising from the proposals will be noted. I am satisfied that the applicant and the Borough Council have given this due consideration. Furthermore I am advised by the applicant that in the longer term the issue of ensuring a suitable level of car parking provision of all types will be considered by Gravesham Borough Council in the overall development of their car parking strategy. 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 issues raised about the car parking are 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. Whilst those commuting out of town understandably would prefer to park closer to the railway station if possible, that has only been possible hitherto due to the long time that the former allotment site off Rathmore Road has remained undeveloped and otherwise underused for a town centre location, and enthusiasm for its continued full use for commuter parking does not amount to an overriding reason to resist alternative use of the land if it could better serve the community as whole.

Noise and Vibration

62. The Noise and Vibration Assessment report previously undertaken in March 2013 and a subsequent Addendum have now been superseded. A further Assessment has been carried out which takes account of the changes to the design of the scheme, which includes construction of a low retaining wall at the back of the southern footway of the new road and gaps in the acoustic barrier necessary for the vehicular and pedestrian accesses to the car park. As with the previous assessment it takes account of the 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).

Construction of the Scheme

63. With regard to the Noise and Vibration Impacts for the Construction Impacts the April 2014 Assessment Report reproduces the relevant section from the earlier March 2013

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Assessment Report. That acknowledges that those properties in close proximity to the New Rathmore Road would have the potential to be most affected by construction and vibration due to the various construction activities taking place, such as excavation and earthmoving. However, it went on to state that the construction methodology and programme have yet to be determined and therefore a detailed construction assessment could not be undertaken at this stage, although it did set out the anticipated mitigation measures.

64. Our Noise Adviser considered that in order to enable the impact of construction noise to be properly assessed, predictions of noise and vibration from each phase of the proposed construction works should be provided. A Construction Noise Assessment based on assumed construction methodologies, plant and programme to identify likely noise impact during construction has now been provided. The conclusions of the assessment are as follows:

“Noise from construction works (if not controlled/mitigated) has the potential to give rise to significant adverse effects on the receptors located close to the scheme, i.e. closest properties by Darnley Road, rear façades properties Cobham Street, 6A Wrotham Road and, 6A Railway Place and 16A Stone Street.

For this reason at this stage the following mitigation measures (which have not been taking into account in this technical note) are anticipated:

- Apply best practice means (i.e. control of noise at source) and control the spread of noise (e.g. screening, etc.) as those stated in BS 5228-1 to reduce noise levels at sensitive receptors

To avoid significant adverse effects due to groundborne noise (and vibration) best practice means and mitigation measures (i.e. control of vibration at source) as those stated in BS 5228-2 (Ref. 5) should be followed by the contractor.

It is noted that restrictions to working hours are likely to be required for noisy activities with the potential to impact sensitive receptors. It is recommended that restrictions to working hours are proposed once detailed construction noise assessment is undertaken and that a Section 61 Prior Consent application is submitted to the Gravesham Borough Council Environmental Health Officer by the contractor appointed for the works.”

65. In response our Noise Adviser considers that the assessment should have outlined the assumed modelling parameters; would have expected to see higher values for operating durations for construction plant, particularly if a worse case assessment is sought; and would expect further information as to the level of noise attenuation which could be expected as a result of the control measures. I consider that these deficiencies in the assessment and proposals for mitigating the adverse noise impacts would best be addressed when the full details relating to construction methodology and of plant are known. If permission is granted it could be addressed as part of the submission for approval of details of a Construction Environmental Management Plan/Code of Construction Practice. In addition, as suggested by the Borough Council the contractor should enter into an agreement under Section 61 of the Control of Pollution Act 1974 to deal with construction noise.

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Operational Use of the Scheme

66. The summary and conclusions of the submitted Assessment in respect of the operation of the scheme are as follows:

“The revised design with the two gaps in the noise barrier has small adverse effects in the short term at some properties between 34 and 43 Cobham Road. These effects become neutral in the long-term Do-Something comparison. Therefore, the effects in the long-term at the properties closer to the gaps in the noise barrier remain not significant.

During the quality assurance process of the noise model of the revised design, Amey decided to amend the way the layout of the junction was modelled between New Rathmore Road, Wrotham Road and Stone Street (originally modelled by Jacobs), in order to better reflect the situation that is expected to exist in the Do-Something scenarios. This caused changes in the effects previously reported for properties at 6A Wrotham Street and from 1 to 4 Cobham Street, which in this report are considered not significant.”

“In the short-term, 265 noise sensitive receptors show minor or major adverse noise impacts [1 major], which is a significant adverse effect, whereas 337 noise sensitive receptors show either minor or moderate beneficial noise impacts [7 moderate], which is a significant beneficial effect.

Therefore, the overall significance of the scheme for noise is slightly beneficial in the short-term.

In the long-term, using professional judgement, the minor adverse impacts (and therefore, significant adverse effects) that appear at 21 noise sensitive receptors on Salisbury Road and All Saints Road are mainly caused by issues not related directly to the scheme. This judgement is based on the fact that the noise increases in the long-term Do-Minimum comparison and in the long-term Do-Something comparison are similar.

Excluding the aforementioned 21 noise sensitive receptors, in the long-term, 1 noise sensitive receptor shows either minor or moderate adverse impacts, which is a significant adverse effect, whereas 7 noise sensitive receptors show either minor or moderate beneficial noise impacts, which is a significant beneficial effect.

The dwelling most affected by the changes in noise and vibration caused by the scheme (with a major adverse impact in the short-term and a moderate adverse impact in the long-term Do-Something) is 15 Darnley Road (east façade). This dwelling shows significant adverse effects on noise and an increase in airborne vibration nuisance. However, the effects on noise are not significant at night. This property also shows cumulative adverse effects, i.e. the adverse effects on noise combined with the adverse effects on air quality.

The dwellings that show the most beneficial effects due to the scheme are properties from 1 to 3 Garrick Street, 6A Railway Place, 16A Stone Street, 24 Stone Street and 160 Windmill Street (the latter is a rear façade which faces to Stone Street). The cause of the benefit at all these properties is the reduction of traffic at Clive Road, Barrack Road and Stone Street in the Do-Something scenarios.

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Overall, taking into account only significant effects, the scheme has broadly neutral effects on noise; whereas taking into account also the non-significant effects, the scheme has slightly beneficial effects on noise.

The current design of the scheme fulfils the project objectives on noise and vibration, i.e. “To minimise the impacts of noise and vibration on the local community using methods appropriate to the surrounding environment.”

Following revisions to the noise model to reflect operational junction use, predicted effects at 1-4 Cobham Street and 6A Wrotham Road are no longer significant and with a change in use at 15 Darnley Road [subject to planning permission], this property would no longer be a noise sensitive receptor. Given these changes, post construction noise monitoring at these properties is no longer recommended.”

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

It has been estimated that the western facades of 15 and 17 Darnley Road would be eligible for noise insulation under the Noise Insulation Regulations 1975 due to the increased traffic noise. Under these Regulations the Highway Authority would be responsible for reassessing the eligibility for these properties following opening of the Scheme. Other properties may qualify for noise insulation and this would be determined following further detailed analysis.

68. Our Noise adviser’s comments under paragraph (27) above will be noted. The findings of the noise assessment are accepted and it is concluded that the scheme is unlikely to give rise to significant noise impacts during operation. It will be similarly noted that the Borough Council has accepted the conclusions of the noise assessment, that the scheme as amended would not generate adverse noise effects. The Borough Council also comments that the minimal increase in noise levels at the properties in Cobham Street, arising from the gaps in the noise fencing, is considered to be outweighed by the public benefit of retaining part of the car park.

69. The criteria for new development in Local Plan Core Strategy Policy CS19 seek to safeguard amenity and amongst other things adverse environmental impacts, including noise pollution. This is also reflected in the NPPF guidance. Taking account of the noise assessments 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 subject to appropriate conditions, relating to construction, post-construction noise monitoring and mitigation measures. In addition, as advised by the Borough Council, an informative could be included advising that the contractor should enter into an agreement under section 61 of the Control of Pollution Act 1974 to deal with construction noise.

Air Quality

70. In submitting the most recent amendments the applicant did not consider that the changes to the scheme warranted a further air quality assessment and considers that the findings of the previous assessments remain valid. The Air Quality Assessment (March 2013) received in August 2013 takes account of the traffic effects of the proposed development being implemented in advance of the delivery of Phase 2 for the Transport Interchange building as indicated in paragraph (19) above. 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

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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 Gravesend Borough Council.

71. The Assessment includes the impact of proposals on the immediate surroundings of the new road, designated Air Quality Management Areas (AQMAs) 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 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.
72. 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 (27) above. The Borough Council accepts the findings of the 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 (27) above.
73. The applicant subsequently 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 would 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.”

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74. 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 used 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 conclusions. Our Air Quality Adviser accepts the responses given, including that the mitigation measures be covered by condition, and had no further comment to make.
75. With reference to Gravesham Borough Council's comment that it does not consider the Land Compensation Act would cover adverse impacts on air quality, the applicant has confirmed that in their view the Act adequately makes provision for deriving compensation where mitigation proposals are not considered acceptable to property owners.
76. In response to consultation on the recent amendments to the scheme, our Air Quality Adviser considered that some further assessment should be required to take account of the effects of the retained car park and relocation of the bus stops on Air Quality. As receptors close to the car park are predicted to experience concentrations of nitrogen dioxide very close to the annual mean air quality objective of the Air Quality Management Area, and although the inclusion of the car park is unlikely to result in a significant change, our Adviser considered that this needed to be assessed. As a result the applicant has now proposed to extend post construction monitoring to include receptors potentially affected by the retention of the car park on Rathmore Road. Where monitoring results identify exceedances then appropriate mitigation would be proposed and implemented to reduce nitrogen dioxide levels to acceptable annual mean levels. Our Air Quality Adviser has accepted this approach subject to it being covered by condition.
77. With regard to the relocation of the bus stops our Air Quality Adviser was concerned about the potential for this to bring potential sources of emissions closer to receptors. The applicant has commented that while reference to the relocation of the bus stops has been made in the planning application, Clive Road/Barrack Row is not within the red line planning boundary. The applicant has also commented that there is scope to change proposed bus locations and with one of the key scheme objectives being to facilitate bus interchange, the bus stop locations are temporary. Furthermore, given the bus stop locations relative to residential properties the likelihood of adverse effects is limited. The applicant proposes to extend proposed air quality monitoring, to measure actual impacts at nearest receptors, rather than revising existing model predictions in response to this issue. In the event of an identified exceedance, alternative locations for bus stops would be reviewed and relocated, as appropriate. Our Air Quality Adviser has accepted this approach subject to it being covered by condition.
78. The criteria for new development in Local Plan Core Strategy Policy CS19 seek to safeguard amenity and amongst other things adverse environmental impacts, including air pollution. The NPPF guidance highlights the need to ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. The Assessments of air quality carried out have been considered in some detail by both the Borough Council's Environmental Health Officer and the County Council's Air Quality Adviser. The remaining issues raised by the latter have now been resolved. If permission is granted, conditions could be imposed requiring a Construction Environmental Management Plan, additional air quality monitoring to be carried out as

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discussed above and appropriate mitigation agreed in discussion with the owners of properties. 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

79. 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 (13) above and also shown on the scheme plan on page D1.9 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 D1.9 and from the cross sections on pages D1.11 to D1.12.] There is also the potential for archaeological remains to be affected by below ground excavation.
80. As outlined in paragraph (26) above, the saved policies (TC2 and TC3 respectively) in 1994 Local Plan attach particular importance to the maintenance of the integrity of Listed Buildings, development making a positive contribution to Conservation Areas, and a presumption against demolition of unlisted buildings in Conservation Areas. Similarly, the Local Plan Core Strategy Policy CS20 accords a high priority towards the preservation, protection and enhancement of heritage and the historic environment, states that the weight given to the conservation value of a designated heritage asset will be commensurate with its importance and significance, and for non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset. 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.
81. 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 (about 492 feet) beyond the footprint of the proposed scheme. 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.
82. 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

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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 effects of the scheme on these assets is considered to be slight beneficial.

83. In terms of the development within the application site itself, the adverse impacts identified in the original Heritage Statement 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.
84. The original Heritage Statement excluded consideration of the demolition of 13 Darnley Road on the basis that Conservation Area Consent had already been granted for that (together with the boundary walls of 15 Darnley Road and The Lodge), as referred to in paragraph (11) above. Conservation Area Consent has now expired and the applicant has provided an addendum to the Heritage Statement with the amendments submitted in April 2014. Since 1 October 2013 there is no longer a requirement to obtain Conservation Consent as well as planning permission for demolition of unlisted buildings within Conservation Areas. The proposed demolitions therefore stand to be considered only as part of this application.
85. The Heritage Statement addendum identifies 13 Darnley Road of medium significance taking account that the whole terrace is locally listed, and as noted above the Darnley Road Conservation Area of high significance. It assesses that there would be a major adverse impact on 13 Darnley Road due to its complete demolition, and its demolition would have a minor adverse impact upon the Conservation Area. The addendum concludes that the significances of the effect of the scheme are moderate adverse to 13 Darnley Road and slight adverse to the Darnley Road Conservation Area.
86. In respect of the adverse impacts of the loss of 13 Darnley Road the addendum states that it would be mitigated by the remainder of the terrace being maintained and

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continuing to make a positive contribution to the Conservation Area; making a full record of the building prior to demolition and if possible, salvaging any items that could be incorporated into other properties in the terrace; and using high quality paving materials in the construction of the new junction which complement the surrounding area. The addendum also considers that whilst not mitigation measures, there are further factors which influence the impact of the loss. These include: the current significant levels of traffic have a detrimental effect on the area; and that there would be an improved view of the edge of the Conservation Area on Rathmore Road due to the demolition of the lodge to the rear of no. 13 which has no historical/cultural heritage significance or architectural merit and has suffered from a variety of uses and the installation of metal shutters

87. The addendum also considers the impact of the retaining wall now proposed along the back of the southern footway on the Grade II Listed railway station building. The original assessment concluded that the scheme had a slight beneficial impact due to the improved reorganisation of the frontage through the widening of pedestrian access and the use of new granite paving materials. The widening of the carriageway was not likely to have an impact. It is concluded that the addition of the small retaining wall along the front of the cutting slope on Rathmore Road is not considered to have an impact on the railway station building and therefore there is no change to the overall slightly beneficial impact previously noted.
88. Both the original Heritage Statement and the Heritage Statement addendum acknowledge the changes that would be brought about by the proposals and provide an objective basis to understand the impacts on the various heritage assets as summarised above. Overall, I agree with the assessments made and consider that the conclusions can be accepted.
89. It will be noted that a number of objections have been received to the demolition of 13 Darnley Road including from an owner occupier of one of the other three terraces of which it is a part. If the need and benefits for the proposed improvement and widening of the road are accepted then clearly that cannot take place unless 13 Darnley Road, and also The Lodge, is demolished. 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 little architectural merit and has little or no significance to the Conservation Area as a whole.
90. The terrace of properties 13 –19 dates from the early 1830s and has been locally listed by the Borough Council as an unlisted building of local interest which makes a positive contribution to the Conservation Area. As such, it is regarded as a non-designated heritage asset. In 2010 an assessment of the terrace was undertaken by English Heritage arising from a request to have the building nationally listed. It was considered that the façade of no.13 was likely to be the closest in appearance to the original character although no.17 retains the greatest quantity of historic fabric of the four buildings. The conclusion reached was that although clearly of architectural and historic interest at a local level, as recognised by their inclusion in the Darnley Road Conservation Area, Nos. 13-19 Darnley Road are too altered to meet the criteria for designation at a national level. In particular, it was considered that the varying degrees of external and internal alteration to each of the properties undermined the architectural interest and integrity of the terrace as a whole.
91. The demolition of 13 Darnley Road would be regrettable since it would diminish the integrity of the terrace and would affect the character and appearance of the Conservation Area. Nevertheless, I do not consider its significance or its loss per se, or

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the effects arising from it, would be overriding reasons in themselves for refusing 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.

92. 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 were previously 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. The applicant could be asked to investigate this possibility by way of an informative, but welcome though such reuse of materials would be, the probability of this happening is quite low since the Local Authorities have very limited control or influence over private property owners.
93. 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 station's 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. However, 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.
94. It is proposed that the barrier would have a close boarded fence type cladding. In response to the earlier comments made by our Conservation Architect and Gravesham Borough Council about the barrier the applicant has accepted the need for landscape planting. Indicative details of landscaping to the barrier have been submitted with the amended details which reflect that the embankment would now be reduced in width. The landscaping details are, in my view, sufficient to demonstrate that the timber barrier would be acceptable with appropriate landscaping and this is also accepted by the Borough Council. Materials and detailing for the proposed retaining walls to the rear of 20-24 Stone Street and also for the retaining wall now included to the back edge of the southern pavement 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.
95. Land to the south side of the new road following construction is now proposed to remain in use for car parking. 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 but, in my view, the visual impact from this side

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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.

96. 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.
97. 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 as discussed above, subject to appropriate conditions, I do not consider that refusal on the basis of the proposed demolitions would be warranted. 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

98. It is also necessary to consider more generally the townscape and visual impacts of the physical changes (referred to in paragraph (79) in the section above) arising from the proposals. In addition to those more directly concerned with heritage assets, the relevant planning policies set out design criteria for new development including the need to avoid causing harm to the amenity of neighbouring occupants, and recognise that good design is a key aspect of sustainable development and should contribute positively to making places better for people.
99. 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.
100. 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 24 Stone Street.

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.

101. In respect of the amendments to the proposals, the applicant has commented as follows:

The changes to the scheme that impact on the townscape are limited to the proposed retaining wall. The reinstatement of the car park will be generally hidden by the acoustic barrier resulting in a neutral effect.

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The proposed retaining wall, replacing the existing ragstone wall, will be set further back from the station entrance, resulting in an overall neutral effect to local landscape and views. The new retaining feature will be constructed of brickwork in keeping with materials utilised for surrounding buildings, retaining structures and boundary walls.

The applicant also comments that during the detailed design process, the opportunity to recycle the ragstone from the existing wall would be investigated. Its reuse for the new retaining wall would be considered depending on the quantity and quality of the material available. If permission is granted this could be covered by way of an informative.

102. 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/cycle 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 quality materials and landscaping which could all 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.
103. 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 (e.g. in Cobham Street) the scheme would still have a moderate adverse impact. In addition with the amended proposals they would now still have views of the car park in use. It does, though, need to be borne in mind that these are private views from these properties, not ordinarily capable of influencing planning decisions in the wider public interest. Options for additional mitigation are anyway quite limited. The acoustic barrier does however provide some mitigation to the visual impacts (albeit now with two gaps for the accesses) which together with the lower level of the road would screen the traffic from most views. In addition, as the tree planting matures 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.
104. 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

105. 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 in an otherwise inner urban setting 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.

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Ecology

106. 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.

Flood risk and drainage issues

107. 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 [*the lowest rating for flood risk*]. 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

108. 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

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these areas to assess the nature and depth of any made ground, with samples sent for chemical analysis.

109. 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:

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.

110. In its views on the August 2013 additional/amended details 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 by 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

111. 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

112. Some questions have been raised and comments made in the representations, as set out in paragraph (30) and appendix 4, 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

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(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.

113. 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 (18) 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 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, since the proposed development is not within a defined Environmentally Sensitive Area, nor likely to have significant environmental effects overall. 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

114. As mentioned in paragraph (46) 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

115. With regard to comments about the adequacy of public consultation, it will be noted from paragraph (29) 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. The amendments to the application received in April 2014 were also publicised in the same way and 122 neighbouring properties notified as well as those people/parties who had previously made representations. In addition, the applicant held an exhibition at the Civic Centre, Gravesend between the 8 and 21 May 2012. Those raising concern about lack of notification of the proposals are therefore not locally affected residents, since the scheme has received extensive publicity and press coverage over the several years that it has been in preparation.

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Funding of the Scheme and loss of car parking revenue

116. A number of objections have been raised about the cost of the scheme with the suggestion that the money could be better spent for other improvements elsewhere in the town. The cost of the scheme and application of funding is not material to determination of this application.
117. However, for information and by way of clarification, the applicant has confirmed that the scheme is to be funded in part from the Kent Thameside Strategic Transport Programme. The funding provided by the Homes and Communities Agency (HCA) towards that programme has already been approved and the business case accepted. More recently a contribution has also been approved in principle by the South East Local Enterprise Partnership (SELEP) from the Local Growth Funding (LGF) announced by the Department of Transport in July 2014. A business case would need to be prepared proportionate to the relatively small scale of the scheme for approval by the SELEP before funds are released. The current estimated scheme cost including costs to date in developing the scheme is £9.5m. The intent is for £4.2m to be funded from the LGF and thereby reducing the call on the HCA grant to £5.3m. Note that HCA funding is strictly ring fenced for transport works in Thames Gateway, and there is no question of it being used to fund other works in the town instead, since if it was not used for this scheme then it would be diverted to another transport project elsewhere in Thames Gateway. The LGF is in theory scheme specific but it is understood that the SELEP would have some discretion in moving funds to another transport scheme if it was not used for this scheme.
118. Some of the representations to the original proposal referred to the loss of revenue to the Borough Council arising from the closure of the car park. In so far as it would apply to the amended proposal with a net loss of car parking spaces, the loss of revenue is a matter for the Borough Council to weigh up against the benefits of the scheme. It is also not a material planning consideration.

Conclusion

119. 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 (including the Conservation Areas, Listed Buildings, 13 Darnley Road and Archaeological Interests), 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 in accordance with the relevant planning policies, including those now affirmed in the recently adopted Local Plan Core Strategy. In my view the benefits arising from the scheme would outweigh the various negative impacts which are discussed in some

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detail in the relevant sections above, including the loss of 13 Darnley Road, the effects on the character and appearance of the Conservation Areas and the settings of the Listed Buildings. On balance therefore, bearing in mind the various mitigation measures proposed and appropriate conditions as discussed above, I consider that permission should be granted.

Recommendation

120. 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 in consultation 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 and a timescale for their implementation;
- details of post construction noise monitoring to be submitted together mitigation proposals and a timescale for their implementation; and
- provision of the 11 disabled parking spaces shown on the submitted drawings.

121. 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;

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- the Archaeological Officer requests that consideration be given to including heritage themes in the detailed design where relevant;
- consideration should be given to the possibility of incorporating items of salvage from 13 Darnley Road into adjacent buildings in the terrace as requested by English Heritage; and
- consideration should be given to the possibility of recycling the ragstone from the existing wall along Rathmore Road and, depending on the quantity and quality available, reusing it in the new retaining wall.

Case officer – Paul Hopkins

03000 413395

Background documents - See section heading
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Appendix 1

Democratic Services Officer's Notes of Site Visit

APPLICATION GR/2012/0441 (KCC/GR/0148/2012) – REALIGNMENT AND WIDENING OF RATHMORE ROAD, GRAVESEND

NOTES of a Planning Applications Committee site visit in the vicinity of Rathmore Road, Gravesend on Monday, 20 January 2014.

MEMBERS PRESENT: Mr J A Davies (Chairman), Mr M J Angell, Mrs P Brivio, Mr P M Harman, Mr P J Homewood, Mr T A Maddison, Mr S C Manion, Mrs E D Rowbotham, Mr T L Shonk, Mr C Simkins, Mr A Terry and Mr J N Wedgbury. Mr C W Caller, Ms C J Cribbon, Mrs S Howes and Mr N S Thandi were also present as Local Members.

OFFICERS: Mr J Crossley and Mr P Hopkins (Planning); Mr P Rosevear (KHS) and Mr A Tait (Democratic Services).

THE APPLICANTS: Mr S Dukes (BSS Economic & Spatial Development).

GRAVESHAM BC: Mr M Jessop and Mr J Pexton

ALSO PRESENT were 3 interested parties: Mr G Foxwell, Mr R Steer and Mrs B Woodward.

- (1) The Chairman opened the visit by explaining that its main purpose was to enable Committee Members to familiarise themselves with the application site and to gain a more detailed understanding of the proposal itself.
- (2) Mr Crossley briefly explained that the application represented what was originally intended to be the third phase of Gravesend's transport sector proposals, involving re-routing of traffic and realignment of an existing road (rather than a road improvement scheme for the benefit of motorists alone) which aimed to provide a holistic benefit for pedestrians, cyclists, public transport users, and people with disabilities rather than just motorists.
- (3) The first phase had involved re-routing traffic past the Civic Centre. Phase 2 would have involved the erection of an interchange building providing a car park with 396 spaces, retail and office units and a bus interchange along Barrack Road. An application for this development by Network Rail had received outline permission from Gravesham BC in 2011. This permission had now expired. As it was unclear whether Phase 2 would go ahead, it was necessary for the Planning Applications Committee Members to consider the Phase 3 proposal both as part of an overall scheme and as a stand-alone scheme.
- (4) Members inspected a number of locations. These are set out below:
 - (a) Civic Centre. The one way traffic route was shown together with the Rathmore Road car park, which would become the route for two-way traffic connecting Darnley Road and Wrotham Road (A226).
 - (b) Civic Square at the corner of A226 Stone Street and Clive Road. The route between Stone Street and Darnley Road would be for buses, taxis and delivery

Appendix 1 *continued*

vehicles as well as cars wanting to use the multi-storey car park. They would travel along Clive Road, but a bus access gateway would prevent access along Barrack Road for other vehicles.

- (c) The point to the north of the station in Clive Road where the bus access gateway would be installed. Mr Crossley pointed out the points along Clive Road (which would take two-way traffic) where the puffin crossings would be put in.
- (d) The Gravesend Station car park (which would become an interchange building if Phase 2 went ahead) providing a car park, retail/office units and bus interchange on Barrack Road.
- (e) The intersection of Barrack Road and Darnley Road. There would be a left turn out of Barrack Road for buses only. Mr Crossley said that most traffic heading north along Darnley Road would eventually turn left towards Dartford. The remainder would be routed around the north of the town centre. The intention was to prevent the creation of a “one way race track” and to make the town centre more readily accessible for the residents.
- (f) The corner of Darnley Road and Cobham Street and edge of the Conservation Area. Members were shown the property (number 13) which would need to be demolished if the realignment went ahead. English Heritage had decided not to list this property (or any of those next to it) because they had lost their historical significance due to various alterations that had been made. An objector commented that whenever Rathmore Road was unable to cope with the traffic, cars would use Darnley Street as a rat run and would create a dangerous bottleneck at the Darnley Street/Darnley Road junction. This view was not shared by the applicants who considered it unlikely that motorists would attempt to use that particular route.
- (g) Rathmore Road (west). Members were shown the property (“The Lodge”) behind 13 Darnley Road which would be demolished. The level of the current road would rise gradually to the existing car park level, with the existing trees (22 in all) being removed. A landscaping scheme, involving substantial replacement tree planting would be carried out. An 8 ft (2.4m) timber acoustic barrier would be erected at the top of the slope on the south side to mitigate the impact of traffic noise on the neighbouring properties.
- (h) The southern entrance to Gravesend Station. There would be no direct impact on the station, which was a listed building. In order to enhance its setting, it was proposed that the forecourt would become more extensive, including a taxi and drop-off area, disabled parking spaces, and a joint cycle/pedestrian route.

Mr Crossley explained the overall concept of town centre routes being shared by pedestrians, cyclists, public transport and motorists so that no one mode of travel would have the right of way. This would lead to greater awareness of the needs of others. The absence of this awareness was a principal reason for moving away from the current practice of segregating the various transport modes.

Appendix 1 continued

- (i) Rathmore Road Car Park. The car park currently catered for 225 vehicles. These would be removed as part of the realignment. Replacement disabled spaces would be provided in other locations. Amenity impacts for the neighbouring residents, including changes in noise and air quality would be mitigated, including a retaining wall. Members noted that the boundaries of the neighbouring properties were very close to the car park and also that a number of cars were parked on private land. Mr Crossley said that none of the local residents had objected about the possible loss of this provision.
 - (j) Railway Place. It was proposed that this street would be widened to enable traffic to flow between the A227 Stone Street and the A228 Windmill Street. This would involve the removal of kerbing and some disabled car parking spaces. This aspect of the proposal had also recently attracted objections from local businesses due to concerns over the loss of delivery/unloading facilities. Members also questioned whether it would be practical to have two lanes as large lorries would need to use both of them when turning into Railway Place from Stone Street.
 - (k) Windmill Street. This was the location of new disabled parking spaces. Mr Crossley said that, although people parking in these spaces would be further from the town centre, this would be compensated by the level nature of the footway and the absence of any roads to cross. He added that other motorists would be able to use the Parrock Street car park which was currently very rarely full.
- (5) Ms Cribbon asked Members to consider the impact on Manor Road when they determined the application. This route had restricted access eastwards from Railway Place, and was likely to become congested if vehicles tried to park there instead of Railway Place.
- (6) The Chairman thanked everyone for attending. The notes of the visit would be appended to the Committee report.

Appendix 2

A petition with 5 signatures from Traders in Railway Place & Windmill Street received following publication of the November 2013 committee report



Traders-
Railway Place and Windmill Street
25/10/13

Mr Paul Hopkins
Kent County Council,
Planning Applications Group,
First Floor, Invicta House,
County Hall,
Maidstone,
Kent ME14 1XX

COPY TO: C	S/11/13
ACB	"
LEA/ST	"

Dear Mr Hopkins

Transport Quarter Proposals- Application KCC/GR/0148/2012 Revised alignment of Rathmore Road

We urge Kent County Council to throw this scheme out.

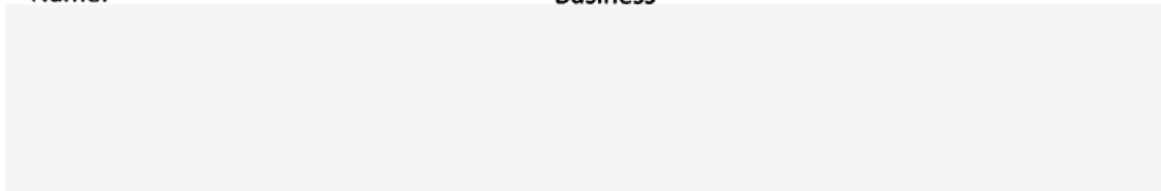
The rerouting of through traffic via Rathmore Road will mean that see the HGV's serving Tescos, the Thamesgate centre and Wilkinson's, and all cars using the Thamesgate Centre multi storey car park diverted write across the entrance to our shops and across the Community Square.

All that traffic funnelled through the very narrow Railway Place will be intimidating to pedestrians and will create a very unpleasant environment. The loss of parking spaces next to our shops, plus all this extra traffic will be severely detrimental to our businesses. We urge you and the Councillors who will make the decision to come and visit our area so that they can see, at first hand, what we are talking about.

We understand that change needs to occur, but the gains of this particular scheme are not obvious at all, and certainly do not outweigh the devastating effect it will have on our businesses and on this part of the town.

Yours sincerely

Name: Business



Appendix 3

A letter from Urban Gravesham received following publication of the November 2013 committee report which was circulated at the committee meeting

Urban Gravesham

The Civic Society for Gravesend & Northfleet



31/10/13

Planning Committee
Kent County Council,
County Hall,
Maidstone,
Kent ME14 1XX

Dear Planning Committee

Urban Gravesham comments on Transport Quarter Proposals- Application KCC/GR/0148/2012 Revised alignment of Rathmore Road

This letter outlines Urban Gravesham's objection to the application for the realignment of Rathmore Road. Urban Gravesham is the Civic Society for Gravesend and Northfleet. Urban Gravesham was established in 2005 and has a large number of subscribing members in the Borough of Gravesend. It is a member of the Kent Federation of Amenity Societies and also Civic Voice- the national charity for the Civic Movement in England. It has the benefit of being able to draw on professional planning, heritage, architectural and financial advice from its membership. The points raised in this letter have been discussed at Urban Gravesham's regular membership meetings and are fully endorsed by the Urban Gravesham Committee.

You will be aware that we have previously objected to this application. However, having read your officer's planning report, we would like to reiterate our points and would be very grateful if you could give them careful consideration.

Although the report is incredibly long and complex, the actual scheme is very simple. The main through road will be flipped from one side of the Railway Station to the other so that most through traffic can be removed from the road between the bus stops and the railway station. In addition, a couple of additional bus stops will be provided at a later (but unspecified) stage. However, the scheme has not been properly thought through. In summary:

- a substantial commuter car park (242 spaces) will be lost.
- your planning officer's report states that *'the impact of the proposal upon Town Centre public car parking is a relevant planning consideration'*

However, the report goes on to state that GBC are the 'parking authority (i.e they own car parks and decide on the charging regime for parking) and that the matter of parking is

Appendix 3 *continued*

therefore up to GBC. This can not be the case- it is like saying that a householder does not need to apply for planning permission to extend his house because he owns it.

It is legitimate for you to consider the impact of the loss of parking upon the town centre.

- There is no commitment whatsoever by Network Rail to build the Transport Interchange building to replace the parking lost by the removal of the Rathmore Road car park.
- No assessment had been made of the potential parking impact of implementing the scheme in advance of the delivery of the Transport Interchange building.
- There are bland assurances from Gravesend Borough Council that capacity exists at the Parrock Street car park for parking that would be displaced by the loss of the Rathmore Road car park. However, Parrock Street is also expected to take parking displaced by the Heritage Quarter scheme. The cumulative effect of the loss of parking at the Heritage and the Transport Quarters does not seem to have been considered.

We urge you, our Councillors, to demand that the cumulative effect of the loss of parking in the town centre is properly investigated and the results reported to you before you make your final decision.

- An attractive house in a conservation area will have to be removed to allow for a widened road. Acoustic barriers and retaining walls will also harm the character of the conservation area and the setting of the listed Railway Station. Further damage will be caused by the removal of mature Hornbeam trees. This damage is acknowledged in your officer's report.
 - Such destruction is symptomatic of the old-fashioned traffic concepts behind the scheme.
 - It is stated in the officer's report that the '*significance of the effects on townscape would ... (be) moderate beneficial*'. This assessment seems to be based on a (very) slightly more open setting in front of the station but principally on the use of high quality paving. UG is all for the use of high quality paving but notes that it can be laid without making damaging changes to the setting of the station and the conservation area.
- The scheme will have a widespread affect on the surrounding road system:
 - HGV's that serve the Thamesgate Shopping Centre and Tesco's and cars that use the adjacent multi-storey car park will be redirected away from the area through the very narrow Railway Place into the Community Square. These vehicles will create an unpleasant and possibly dangerous environment on this important pedestrian route from the town centre to the station and from the town centre to the Council offices. Your officer's report indicates that no detailed safety audit of this arrangement has been carried out.

We urge you, our Councillors, to demand that a detailed safety audit is carried out and the results reported to you before you make your final decision. We are therefore asking you not to make a decision on this application at your meeting on the 5th of November.

- It is difficult to see how heavy traffic through Railway Place and Windmill Street will not harm the businesses at Railway Place. Additional harm will be caused by the removal of

Appendix 3 *continued*

disabled and short term parking in this vicinity. There has been no specific consultation with individual businesses over this matter.

The businesses on Railway Street would appreciate a site visit from the Planning Committee before you make your decision.

- The Community Square will also be affected. It has recently benefited from a very extensive (and expensive) improvement scheme that removed the vast majority of HGV's from Windmill Street where it runs across the square. To reintroduce HGV traffic seems crazy.
- The scheme will enable a 'rat run' from West Street (by the river) up Princess Street and Stone Street to Railway Street. Your Highways officer gave informal advice to myself that changes to the sequencing of traffic lights would deter this. However, we note that twelve bus routes currently use Stone Street. These will also be affected. This does not seem to have been given consideration by your officers.
- The scheme does not have the benefit of outline planning permission, nor is it likely to be a 'piece' of the jigsaw.
 - The outline planning permission for the Transport Quarter as a whole is now time expired.
 - Network Rail were to have been responsible for phase 2 of the scheme (Transport Interchange). However they have no funding for this phase and are not committed to carrying it out.
 - Your officer does not seem clear on the benefits of the application as a stand alone proposal, stating (paragraph 41) that he felt the need to seek advice on whether it is the role of the planning authority to question '*the need or otherwise of what is proposed*'. He concluded that it was not their role. UG's view is that when a scheme causes demonstrable harm it is entirely justifiable to assess this harm against the 'need' for the scheme.

Overall, there are very small benefits to be gained from carrying out this unnecessary scheme. The Transport Assessment that accompanies the application shows that the scheme will not result in increased road capacity or better traffic flows- it even says that the present capacity is 'ample'. The marginal improvement in pedestrian connections between bus and train facilities, plus some new paving is outweighed by the potential danger and unpleasantness that would be introduced to pedestrian areas elsewhere- including the new Community Square. It is also outweighed by the unnecessary loss of a well used commuter car park, and it is outweighed by damage to the townscape.

There is simply no good reason to pass the scheme, and plenty of reason, as summarised in paragraph 93 of your officer's report, to refuse it.

We believe that GBC officers and consultants have made a blunder in not realising the full consequences of their scheme. Instead of admitting that there has been a mistake they are ploughing on with it.

Appendix 3 continued

Your officer's report points out some of the obvious flaws of the scheme before coming to what it describes as a balanced conclusion. It will be obvious by now that Urban Gravesham does not agree with that conclusion. Nevertheless, the fact that report describes itself as 'balanced' means that there is leeway for you, yourselves, to weigh up what you believe are the pros and cons of the scheme and to come to your own conclusion as to whether to approve or refuse the application.

In coming to your decision we believe that a quick site visit would show you that our view is correct and that the scheme should be refused. On this occasion, we are relying on you, KCC Councillors, as the last bastion of common sense.

Thank you for taking the time to read this.

Yours sincerely



Chairman, Urban Gravesham.

Appendix 4

A letter on behalf of Urban Gravesham received following publication of the November 2013 committee report raising some legal questions and our response both of which were circulated at the committee meeting



Andrew Tait
Kent County Council

Dear Mr Tait,

RATHMORE ROAD HIGHWAYS SCHEME

Thank you for notifying me of the forthcoming decision and for the copy of the Report concerning the Rathmore Road scheme and for your invitation to speak. I have seen the letter from Urban Gravesham in response and I endorse what they say as to the merits of the scheme (or, to be more precise, their absence).

However, they have asked me to write in respect of further matters in the Report to Committee, the legal consequences of which concern me.

Heritage Assets and the Section 72 statutory duty

Firstly the Report indicates at paragraph 65 that the assessment of heritage assets “*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. Paragraph 10 of the Report states: “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.”*”

It is clear that the decision to grant Conservation Area consent to demolish No 13 Darnley Road is as a direct consequence of the previous proposals for Rathmore Road in particular and the Transport Quarter proposals generally, permission for which has now expired. In short there is no extant approved scheme to realign Rathmore Road and no planning permission to which the condition in the Conservation Area consent relates. Thus it is a consequence of this application that its approval would be necessary to enable the CA consent demolition to be carried out.

Section 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides a general duty in the exercise of planning functions to pay “*special regard to the desirability of preserving and enhancing the character and appearance of the Conservation Area*”. The importance of this provision was highlighted in the recent decision of the High Court in *East Northamptonshire District Council case [2013] EWCA 473* (attached) where the judge referred to the duty under section 72 which emphasises the importance of this duty which should be given a “*high priority*” and “*considerable importance and weight*” in planning decisions (see paragraphs 36, 37 and 38). So far as I can see, the Report makes no reference to this duty. Moreover the assessment of the effect of the demolition of 13 Darnley Road is omitted from the Heritage Assessment, and has been considered briefly only in paragraph 68 of the Report in the following terms:

“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.”

Appendix 4 *continued*

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.”

It is immediately apparent that the author has given no indication that he is aware of, or has assessed the impact of the development on the basis of the “special weight” or the “special regard” referred to by the Judge in *E Northants* to be paid to the desirability of preserving or enhancing the historic character and appearance of the CA.

It should be recalled that this is a remarkably original and unaltered terraced house dating from the 1830s and part of an attractive terrace of late Georgian houses, characteristic of the early C19th development of Gravesend and remarkable for its unaltered condition. I believe that it is locally listed.

Paragraph 128 of the NPPF requires planning authorities in determining applications to describe “*the significance of any heritage asset affected*”. I can find no such assessment of the significance of 13 Darnley Road in the Report. It should clearly have formed part of the assessment of Heritage Assets described in paragraph 65 of the Report or to have been assessed in the Report itself. Paragraph 140 of NPPF requires the *significance* of the asset to be identified and assessed and taken into account when considering the impact of any proposal on an asset. As the significance of the asset has not been assessed (or if it has, not reported in the Report), its significance has not *been assessed* as per the Framework. Moreover, the assessment that is set out in paragraph 68 provides nothing to indicate that the author of the Report gave the required “*special weight*” or “*special regard*” to be paid the preservation and enhancement of the CA. As the *East Northants* case makes clear, the duty under the Act means it this is not simply a question of weighing harm against the public benefits.

I would suggest that this lacuna in the Report is not a gap that can be plugged by some hasty supplementary report at this stage, but in order to carry out the exercise and assessment that the statutory duty requires, the Heritage Assessment should be carried out again as a comprehensive exercise taking into account the special regard required by section 72 and applying it to all the relevant buildings, including No13 Darnley Road.

Prematurity and the Gravesham Core Strategy

Secondly, consideration of this application is premature as (i) the outline permission for the overall scheme for the Transport Quarter has expired; and (ii) the Gravesham Core strategy has recently been the subject of the Examination in Public and as a preliminary finding by the inspector declared unsound. The full report of the inspector is awaited. I was unable to find any recognition of this fact in the report which appears to rely on a draft Core Strategy as a material consideration, despite Gravesham Council having accepted the Inspector’s finding that it is unsound and the need to revise it, submit the plan for public consultation and re-open the EIP which will take at least a year. The Report shows no indication that this highly important change of circumstances has taken place since the previous Masterplan outline was approved.

Moreover there can be no assumption that the old masterplan will be approved. It is not clear why the old outline permission has been resubmitted given the change in both Phases 2 and 3. A major feature of that masterplan now looks very unlikely to be delivered – the Phase 2 multi storey bus interchange and car park. As to Phase 3, I note that much of the ancillary development proposed for the Rathmore Road area (including new housing and retail/ B1 development) appears to have been dropped and there are significant changes to the alignments of carriageways from those in the expired outline permission.

The Transport Quarter is a very substantial project and has never been the subject of serious dialogue with the local community. I would urge the committee to defer the decision and to review the entire project which seems to me to be one which would cause material damage to the townscape and achieve very little benefit for a great deal of expenditure. The Rathmore

Appendix 4 *continued*

Road proposals on their own are massively expensive, unwanted by the local community and part of a scheme which needs to be comprehensively reviewed for its overall costs and benefits. It is unclear why a project of this nature has never been discussed at the Neighbourhood Forums organised by the County Council.

If the County is keen to spend money on regenerating Gravesend Town centre, it may be helpful to remind Members that this is a town of 90,000 people with no museum, art gallery, cinema, etc. Investment in culture, not its destruction for road projects of this kind is what is needed.

EIA

Thirdly, whilst the Masterplan was the subject of a screening opinion for EIA, that permission has expired and the new application must be screened afresh for EIA. There can be no doubt that the application for Rathmore Road is part of a larger scheme and that entire scheme should be considered and screened for EIA, not piecemeal but as a comprehensive development project: see *R. Swale B.C. ex p RSPB* [1991] JPL and *BAA v. Secretary of State* [2003] JPL 610. There is no extant planning permission for the Transport Quarter as a whole and no currently extant permission for a larger scheme which includes this project has been assessed for EIA. The duty to consider whether the development is EIA development is one that applies to the decision maker and they should carry out a proper screening of the overall “project”. This cannot be delegated to Gravesham. It is inconceivable that a project of this scale and nature, affecting the setting of listed buildings, which are of national importance by definition, and conservation areas designated under statute by Gravesham, can avoid EIA by the kind of lip-service decision that simply states that the development is only of “local importance”. There is certainly no power to delegate such a decision to another authority.

In summary of this point, this application is for a component of a much larger scheme which has (i) no permission; and (ii) the current application has not been screened for EIA. The duty is therefore on Kent to screen the overall project as per the BAA decision.

In any case, the resubmitted application for the masterplan will presumably need to be amended to reflect the changes to Phase 3 -Rathmore Road and the likely non delivery of the multi storey component in phase 2. Any revised masterplan has, similarly, of course, not been screened for EIA. The scheme is pre-emptive of that process too.

I note from the Report the conclusion that the scheme conflicts with both the development plan and the NPPF and its lukewarm “on balance” conclusion at paragraph 92 mean that the whole Report should be reconsidered on a proper basis.

From the above you will, I hope, recognise that any decision based on the Report is certainly premature and, in any case, likely to be unlawful.

Moreover, there is plainly no great urgency for this scheme. Perhaps Members could be kindly invited to visit the site in the spirit of “Localism” and to discuss the scheme with local people and their civic organisations in Gravesend, where they can see what a damaging proposal it is. I suspect there would be many suggestions as to how the money could be better spent; in fact, better not spent at all than spent on this.

I would be most grateful if you would consider these comments and ensure this letter is placed before the Committee on Wednesday, as I am unable to attend.

Yours sincerely



Appendix 4 *continued*

Item D1 Planning Applications Committee 6 November 2013

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

Appraisal of points raised by Mr [REDACTED] of Urban Gravesham in correspondence received on 4 November 2013 (“4 November letter”). The letter raises questions about Heritage Assets, Prematurity and the Gravesham Core Strategy, Environmental Impact Assessment and also Local Engagement. These matters are dealt with in the Committee Report but I would draw particular attention to the following points:

Heritage Assets and the Section 72 statutory duty

The significance of heritage interests is thoroughly assessed in the Committee Report – see paragraphs 63 – 74 pages D1.43 to D1.46. It is important to read these as a whole. Selective quotation from paragraphs will of course give a partial view of what is being said. In respect of 13 Darnley Road, Paragraphs 68, 69 and 74 of the Committee Report show that proper consideration has been given in appraising the significance of that property, contrary to what is said in the 4 November letter.

The case cited affirms the state of the law in this area rather than changing it, as is implied. It emphasises what the statute already says, which is that “special attention” (not “special regard” as Mr [REDACTED] believes) should be paid to the desirability of preserving or enhancing the character or appearance of the area in the exercise of planning functions. The case referred to concerns wind turbines and their impact on the settings of a group of Grade 1 Listed Buildings. The Rathmore Road proposal relates to the alteration and realignment of an existing street, in the vicinity of a Grade 2 Listed Building, and involving the demolition of two unlisted buildings in the Conservation Area (and already the subject of a Conservation Area Consent for demolition). The main relevance of this judgement seems to be the extent to which the decision maker was able to demonstrate that in balancing the determining issues, the issue of protecting the settings of the Listed Buildings carried more significant weight compared to other issues, such as the need for the development. Members will note that the assessment of the impacts on heritage assets is a thread running through a key section of the Committee Report. This is not an issue to which ‘lip-service’ has been paid.

Lastly, in addition to the position on heritage it is perhaps worth noting that English Heritage make no objection to the proposed development. That is not of itself the last word on the matter but it clearly accords with our own assessment of the proposal in heritage terms.

Prematurity and the Gravesham Core Strategy

The initial findings of unsoundness in the Core Strategy relate to future housing land provisions. Until the Core Strategy achieves approved status, the draft policies and provisions relating to transport remain a material planning consideration, albeit with lesser weight than if already adopted.

In the circumstances, there is no reason to defer consideration of the planning application on the basis of prematurity.

Appendix 4 continued

Environmental Impact Assessment

The application is for a standalone development project promoted by Kent County Council as highway authority and not dependent upon any third party development. As referred to in paragraphs 17 and 89 of the Committee Report we adopted a Screening Opinion in respect of the proposed development which concluded that Environmental Impact Assessment is not required. A copy of this has previously been provided to Mr [REDACTED]

Local Engagement

It is incorrect to assert that there has been scant local engagement with the local community, as the 4 November letter suggests. Apart from extensive publicity and notification of local residents in May 2012 and August/September 2013, the applicant held an exhibition in May 2012 and there were earlier consultations regarding the wider Transport Quarter Master Plan proposals. The earlier versions of the Master Plan were well publicised in local media, and on posters within and around the Transport Quarter and Public exhibitions were held. Nor is it correct to infer as the 4 November letter does that the local community do not want the Rathmore Road proposals. The fact is that very few members of the local community lodged any objection to the planning application; it is not reasonable to interpret that silence as opposition.

Having considered the matters raised I remain of the view that there is no reason to defer consideration or delay determination of the application.

Sharon Thompson
Head of Planning Applications
5 November 2013

Appendix 5

Letter addressed to the Chairman of the Planning Applications Committee from two of the Gravesend residents who attended the Members' Site Visit setting out their conclusions and recommendations on the issues that emerged



Dear Chairman of Planning Committee,

RE Rathmore Rd Development, Gravesend

Thank you for agreeing to the site visit and for organising the event for councillors, officers and local stakeholders.

[Redacted] and I have been discussing the issues that emerged and we wish to share with you our conclusions and recommendations.

1. It is clear that the multi-phased transport quarter development of which the Rathmore road scheme was phase three is now defunct.
2. Officers now confirm the scheme has to be judged as a stand-alone scheme, whose primary objective is to provide a better gateway for the town from the station/transport hub.
3. In our view the case for this is very weak for the following reasons:
 - Car parking close to the station will be lost and will call for parkers to be diverted to Parrock Street car park, away from the High street. Car Park users are opposed to this and have written to Kent CC accordingly.
 - It is not yet confirmed that bus operators will agree to move bus stops from outside the shopping centre to Barrack Row to enable two-way traffic down Clive Road. Local Shops are not in favour of this.
 - Pedestrians will still have to use the existing crossings to access the shops in the town centre under this scheme but instead of negotiating one-way traffic they will now face two-way traffic as they emerge from the station. This is not an improvement. Any loss in volume will only encourage greater speed and thus danger to pedestrians.
 - The gateway into the towns shopping area via railway place will be restricted and made more hazardous by trying to fit heavy goods vehicles and from opening up a rat run south through the community square via Stone street. Local shopkeepers are vehemently opposed as it will affect footfall and their businesses which rely on local shoppers having space to pick up goods | the parking and disability bays that will be removed.
 - Mr Crossley admitted the scheme has no traffic benefits. We would estimate that it will cause bottlenecks at peak periods at the Junction with Darnley Rd and will cause further rat runs down Darnley Street and congestion onto Darnley Rd and Pelham Street. Thus the scheme will deter users of the town centre at a time when Mary Portas has emphasised the importance of ready access to cheap car parking as an important factor in attracting city centre shoppers.
 - Stone street will be used for vehicles leaving the retail park (Asda Lidl B&Q Halfords Carpetright etc) to short cut the one-way system leading to further traffic through Railway Place.
 - Other cheaper and simpler options are available to improve access for pedestrians and for attracting shoppers into the town.

Appendix 5 continued

4. An alternative worth investigating further would be to develop the area designated for the Multi storey car park as a more modest bus station with investment in improved crossways for pedestrians toward the High Street. We understand a worked up example would be much cheaper and provide more benefits than the Rathmore rd scheme.

5. If commuters coming into Gravesend for the high speed link cannot park by the station they will consider going straight to Ebbsfleet where they can park all day for £5 and have a choice of more frequent trains. This would result in a loss of trade in the small shops in and around the station.

6. Our recommendations are therefore:

- To refuse planning permission. The scheme as proposed is superfluous and over engineered to improve the gateway to the town. Cheaper alternatives are available and better ways of spending the money allocated exist.
- To investigate further improving the bus station and access to pedestrians to the town without the option of losing car parking spaces.

Appendix 6

Further letter from one of the Gravesend residents who attended the Members' Site Visit addressed to the Chairman of the Planning Applications Committee which was circulated to Members of the Committee by the Committee Clerk on the 16 May 2014.

Letter to the Chairman of the Planning Committee, KCC

Re: KCC/GR/0148/2012 Rathmore RD Gravesend

Dear Chairman

I wrote to you on 27th January to thank you for listening to representations about this scheme and for organising a site visit.

Attached is a letter of objection to the revised scheme. But what I would like to highlight is the decision making process and to further prevail upon you to consider asking the proponents of the remaining aspects of the Gravesend Transport Quarter Scheme to put it forward for approval as one scheme.

Approval for the Transport quarter and the demolition of 13 Darnley Rd has lapsed. It makes no sense for this scheme to come forward in a piece meal manner. It was always an integrated proposal and has complicated and muddied accountability by breaking it down into multiple phases and with uncertain backing from stakeholders.

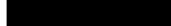
The benefit of seeing it as one scheme is that it enables councillors to assess the overall costs and benefits. I believe if this were done it would be clear that the costs outweigh the putative benefits. The supposed need for a decision has been undermined by events and if the Swanscombe development takes off then transportation links would have to be further reappraised anyway.

My recommendation is that KCC remit the transportation hub requirements of Gravesend as part of the Swanscombe development as a National Infrastructure project to the relevant national planning authority.

Yours Sincerely,

A large black rectangular redaction box covering the signature of the sender.

16.5.2014

A black rectangular redaction box covering the name of the sender.

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

Appendix 6 *continued*

Objections to the revised Transport Quarter Interchange In Gravesend including the Rathmore Road proposals before Kent CC Planning Committee.

1. Introduction

The latest changes to the scheme are addressed in a report from Amey. However this is inadequate in terms of the requirement to review the costs and benefits of the proposals. This may be deemed unnecessary as the decision to proceed with the scheme subject to planning approval has already been made. But this is not true and should not be true. Outline planning for the Transport Quarter and the demolition of 13 Darnley Rd have lapsed and the scheme as a whole should be re-presented. The arguments and questions are laid out below and my conclusion is that the scheme should continue to be appraised and re-thought. There is no pressing need for a decision; there is great strategic uncertainty; and serious questions about the detailed safety, traffic impact, commercial impact and overall need for the project.

2. What development of Rathmore Road is supposed to achieve

The stated aims of the scheme were to:

- Facilitate the creation of a bus and rail interchange and bring the transport modes together to make the interchange between the various transport modes a lot easier
- Improve access for pedestrians and cyclists
- Develop a distinctive town quarter that complements the historic qualities of Gravesend by rerouting traffic south of the station and railway line

When first proposed it was based on projections from Network Rail (Southeastern) that they were expecting footfall at Gravesend station to increase by nearly 770,000 between 2006/07 and 2010/11 principally as a result of the introduction of high speed services. Southeastern has then predicted that footfall to 2013/14 would increase by a further 300,000. These figures provided further justification for the delivery of the new public transport interchange to improve connections to the railway station by more sustainable modes.

Use of the station is falling

In fact usage of the station has been:

Annual rail passenger usage*	
2004/05	2.247 million
2005/06	▲2.358 million
2006/07	▲2.482 million
2007/08	▲2.786 million
2008/09	▼2.717 million
2009/10	▼2.502 million

Proposed realignment and widening of Rathmore Road, Gravesend –
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Appendix 6 *continued*

2010/11	▲2.647 million
- Interchange	▲43,815
2011/12	▲2.706 million
- Interchange	▲63,462
2012/13	▼2.646 million
- Interchange	▲65,872

My conclusion is that the supposed increases in capacity required to accommodate increased numbers of passengers is a myth. In fact numbers have fallen; part of the explanation for this will be the rise in usage of Ebbsfleet as a station for commuters into London.

Annual rail passenger usage*	
2009/10	0.284 million
- Interchange	25,036
2010/11	▲0.717 million
- Interchange	▲32,864
2011/12	▲0.912 million
- Interchange	▲47,238
2012/13	▲1.175 million
- Interchange	▲49,124

An explanation why this may be happening is that Ebbsfleet benefits from a more regular commuter service than Gravesend and Car Parking is no more expensive.

Appendix 6 *continued*

Impact on Bus Passengers will be worse

We also note that facilities for Bus Passengers will worsen under this scheme. Foot passengers will be deposited further from the station and shops, with bus stops moved from Clive rd. It was not the intention to provide worse facilities and access for bus passengers but the Council should be looking at the reality not the propaganda. For people deposited south of the station access to the town will be much affected by having to negotiate crossing Railway place and Stone St, made much busier and with lesser pavement area and with very large lorries posing a danger. Alternatively they are being asked to negotiate the very narrow Darnley Rd bridge made much busier with many more HGV's.

Impact for foot passengers and cyclists

The impact for foot passengers will be worse as the gateway to the town from the south will be made more hazardous either via Darnley Rd, Railway place or Stone Street.

From the North, rail and bus passengers will be funnelled to the High St via the current bus station. This will make for increased congestion and not be as useful for people wishing to access the Town from Railway place, Stone Street or the Thamesgate centre.

Facilities for cyclists are not improved under this scheme which I would argue makes it more hazardous for cyclists looking to access the centre as they will have to negotiate busy two-way traffic lanes if accessing from the west and south.

Conclusion

Tested against the schemes own objectives and desire to meet the needs of increased numbers of passengers the proposals do not work. The need is not demonstrated nor are the "improvements" evident. My assessment is that the access and impact on the gateway to the town would be made worse.

3. No Need to Invest £9m and make a quick decision.

As the passenger numbers show there is no pressing need to do anything. The projected increase in passengers has failed to materialise. It may be argued that the impact of Ebbsfleet and increased population in Gravesham will have an impact in time; and there is still the potential for impact from the Swanscombe development, London Airport and Thames crossing to consider. All these factors say to me that there should be further consideration as to whether this scheme is the right one at this time. There seems no great advantage in proceeding quickly. For example the Planning Inspector still has not approved Gravesham's Strategic Plan and without a Strategic Plan this scheme would be a risk.

4. Revised Details of the Scheme are still not better than current arrangements

Loss of car parking spaces close to the station: The whole point of a transport hub was to facilitate use of that hub. This was why the original proposals contained a 496 space multi storey car park. This was never an economic proposition and has been scrapped. It makes no sense at all to reduce the existing well used car parks. Reinstating 65 places is merely partial admission of the mistake. 180 places would still be lost, including valuable close access for disabled drivers.

Worse access for Disabled Drivers :

Moving disabled parking from close proximity to the Windmill entrance to the town to the remaining Rathmore rd proposed car parking at the bottom of the hill leading from the station to Railway place is a worsened access and reduced amenity. Similarly identifying places in Parrock Street is still not satisfactory for the disabled.

The one way system will not flow as well and will result in congestion and diversion of people away from Gravesend Town Centre

The modelling contained in Figure 3 is simply not credible. It seems to be based on the assumption that there will be a 20% fall in the number of people using the centre (see the unexplained drop in numbers expected from feeder roads in the morning rush hour); no account seems to have been

Appendix 6 *continued*

taken of the extra time it will take traffic to negotiate the likely bottleneck at the junction of Rathmore rd. and Darnley rd and the impact this may have on Darnley st as cars seek to avoid the bottleneck. There is no modelling evidence presented that the traffic flows will be better and at the site visit the official admitted that there would be no improvements to traffic flows. I go further as a local resident- they will be worse. It is not good enough to say the situation would be closely monitored. It will be too late then. I would prefer the scheme to be tightly planned. It is not.

After some pressing drawings plotting the path of HGV's round this junction were produced and placed on the website. My interpretation is that these traffic movements would be dangerous, risky and with potentially major impact on the Railway bridge and the railway lines below. There seems little margin for errors over a narrow bridge bringing very many rail passengers and pedestrians into the town. It is a serious accident waiting to happen and a full report evaluating all the risks associated with the scheme should be presented.

This scheme was supposed to enhance the transport hub and improve access for pedestrians. If it poses a barrier of slow moving and polluting HGV's then it will deter pedestrians and car commuters alike.

This is serious as one of the attractions hitherto of Gravesend is ready access to close and cheap car parking. If this becomes more remote and expensive then people will stop coming to Gravesend. The antithesis of the objectives of the scheme.

The creation of two way traffic on Rathmore Rd and Clive Rd will be dangerous and be contrary to a one way system supposedly in use

The busy two way traffic down Rathmore rd and Darnley Street will be more dangerous for pedestrians accessing the town from the south and the two way traffic down Clive Street will also be more difficult for pedestrians to cross. There is no improved pedestrian environment as claimed with less easy access to the Thamesgate centre, narrower pavements (to accommodate two way traffic) and two traffic to be alert to. The arrangement also contravenes the logic of a one way system and will likely lead to confusion not clarity.

The North entrance to the station will become congested with cars and traffic in the morning and afternoon as cars will drop off and pick up passengers and double back.

This will be more dangerous than the existing arrangement which does not allow for cars turning.

Reference is made to a future interchange on Barrack Rd but there is no confidence it will be delivered.

There are references in the report to potential future interchanges as though this were realistic. We know that nothing is in Network Rail plans to 2028 and the bus operators would not need to run a bus station, and do not even seem to have been consulted(p7). In fact bus passengers are being shunted further way from the station ; it is not clear whether the new stops can accommodate the buses (this was an issue previously mentioned but not cleared up) and for people wanting to use the Thamesgate Centre the access is much worse.

Vague improvements are promised

The reality is that there will be loss of architecturally important buildings, loss of splendid mature trees and green space, car parking and easier and safer access for pedestrians and bus passengers.

Much simpler and cheaper ways could be found to improve paving and the environment.

Arrangements for cyclists remain far from ideal.

Despite warnings of the hazard Rathmore rd is still designated as a shared cycleway/pathway. The opportunity has not been taken to identify investments to achieve better and safer access for cyclists.

Businesses on Railway Place and Windmill hill will be badly affected.

Each of the businesses on Railway Place and at the bottom of the community square end of windmill hill face serious loss of trade from customers used to picking up from outside the shops. Although the pull space is seemingly retained it will be hazardous to use it if in the way of HGV's, who cannot squeeze into the area without impinging onto the pull in area. The narrower pavements and busier traffic will act as a barrier for pedestrians accessing the town from this direction; particularly in the

Appendix 6 *continued*

evening when traffic, including heavy lorries will be three times that of now. The proximity of heavy traffic will make it even more unlikely a tenant will be found for the Railway Tavern.

The presentation of the traffic flows on page 10 is disingenuous as the traffic through Railway Place and Community Square will increase by up to 300%, and claims that Traffic along Clive Rd will be less dominated by traffic is belied by the fact that in future traffic would be two way, on wider roads and be more hazardous for pedestrians.

Impact on Heritage

The overall costs and benefits of the revised transport quarter development needs to be reappraised in the light of all the changes. In my view all the losses of amenity, including loss of 13 Darnley Rd and trees are no longer worth the notional advantages of the scheme as currently proposed. The ambience of the area would best be preserved by keeping the existing arrangements.

The impact on Townscape and Visual Impact

No attempt has been made to render an artists impression. It is likely to represent and ugly and out of place gash in the urban landscape. At present there is a magnificent stand of mature trees softening and complementing the townscape and station.

Noise

Again the report is disingenuous as for some people the noise will be worse: Cobham street and Darnley Rd and Darnley St, Stone St Windmill Hill and Railway Place. It would be more honest to be explicit about this.

Air Quality.

If traffic flows are badly affected as I predict the air quality suffers as it is linked with the speed of vehicles passing though. More Traffic through railway place and Windmill hill will affect the environment within the community square badly and impact on the letting ability of the Windmill Tavern.

5. Process of Decision making

It is presumed that the incremental changes to the scheme will be presented and the scheme voted on as amended.

This is wholly unsatisfactory.

The initial Planning permission for both the transport quarter and the demolition of 13 Darnley rd have lapsed. Many of the major aspects of the Transport Quarter plans have been dropped or substantially amended.

In my view the scheme should be presented as a complete proposal encompassing all the elements of the Transport Quarter development so that decision makers can be aware of the total costs and benefits of the total scheme rather than it be dealt with in a piecemeal way.


To continue to proceed as now runs the risk of a scheme being built of no value and running the risk of being damaging in both the short term (because of the loss of amenity and disruption caused) and in the longer term (because it will damage Gravesend as a transport hub and divert traffic away from the centre).

6. Conclusions and Recommendations:

- A. The original Objectives for the Transport Quarter have been overtaken by events. There is no pressing need for a decision and further clarification of transport needs should be made before decisions made.
- B. The Most Important Objective should be to preserve the heritage and history of the town so as to attract users and shoppers. This scheme risks damaging it for no overriding purpose.

Appendix 6 continued

- C. The revised details still envisage loss of car parking, demolition of historic buildings and trees, risks to pedestrians and loss of businesses around Railway Place. Plus it is not credible that traffic flows into the centre will reduce as modelled or that traffic will flow any better. Much more reassurance on traffic flows and modelling needs to be provided.
- D. This scheme should no longer be seen incrementally but represented as an integrated Transport scheme so that its costs and benefits can be reappraised. Until this happens Planning permission should be refused as it still not clear what is in or out or whether the costs exceed the putative benefits. It is hinted that other elements could be added later but that is not good enough as the basis for a decision.
Core elements of the revised scheme should be a summary of the costs and benefits and a health and safety audit.


16.5.2014

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

Appendix 7

A petition with 86 signatures collected by a café owner on Railway Street received in response to the further publicity and notification relating to the amendments received in April 2014

KCC/GR/0148/2012 Revised alignment of Rathmore Road and Railway Place

We object to the heavy traffic and HGV's being diverted through Railway Place and the eastern side of the Community Square. We also object to the loss of unloading bays and disabled parking at Railway Place. We believe that the proposals are inconvenient, and will damage businesses.

Name	Address	
