



Ebbsfleet Development Corporation

The Observatory
Castle Hill Drive
Cstle Hill
Ebbsfleet
Kent
DA10 1EE

Highways and Transportation

Kroner House

Eurogate Business Park

Ashford

TN24 8XU

Tel: 03000 418181

Date: 23 October 2023

Our Ref: AC

Application - EDC/22/0168

Location - Ebbsfleet Central East

Land Adjacent To Ebbsfleet International Railway Station

Thames Way

Kent

Proposal - Outline planning application (with all matters reserved) for mixed-use development comprising demolition of the existing car parking, Structures and station forecourt and provision of residential dwellings (Use Class C3); flexible commercial, business and service uses (Use Class E) to allow provision of retail, offices, restaurants/cafes, nurseries, and healthcare facilities; flexible learning and non-residential institutions (Use Class F1); flexible local community uses (Use Class F2); hotel use (Use Class C1); residential institutions (Use Class C2); and Sui Generis uses to allow provision of co-living and student accommodation, public houses/drinking establishments, and theatres/cinemas. Associated works include hard and soft landscaping, a River Park, car parking and multi-storey car parks, pedestrian, cycle and internal vehicular network, and other ancillary infrastructure; and associated crossings, highway accesses, and junction improvements.

Thank you for your re-consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

Transport Assessment Addendum

Personal Injury Collision data has been analysed for the period between 1st October 2017 to 30th September 2022. The analysis as presented is acceptable.

Paragraph 4.4.7 explains why TEMPRO growth has not been applied. This is acceptable since traffic from committed developments has been added separately.

As stated in paragraph 4.4.33, the assessment has been carried out without a percentage reduction to Eastern Quarry trips, which is supported.

With regard to the traffic flow diagrams in Appendix P, it is noted that there is a significant difference in northbound traffic flows on Thames Way in the AM peak scenarios between the junction with Springhead Road and the junction with the A2260 Ebbsfleet Gateway junction. For

example, in the 2032 EC1 and EC2 Maximum Residential scenario for the AM peak, there are 928 PCU's at the Springhead Road junction and 1,024 PCU's at the Ebbsfleet Gateway junction. Please provide clarification.

With regard to trip generation, please confirm the size (sqm) of the C2 Residential Institution, C4 Co-living use and Sui Generis uses. Whilst paragraph 4.5.5 of the report refers to sui generis, there are concerns that all three of these uses will attract trips from outside of the site, and further information is required.

The KCC Traffic Signals team have reviewed the proposals for the signalised junctions and LinSig modelling results, all of which are now acceptable. Minor issues can be addressed at the detailed design stage when they go through technical approval. For clarity, the agreed plan for drawing 103780-PEF-EC-XX-M2-Y-000016 is P07 as shown on page 263, not P04, as shown on page 104.

As requested, the following additional junctions have been assessed:
Grove Road / B2175 / A226 roundabout;
Springhead Road / Thames Way roundabout; and
Springhead Road / Hall Road / Superstore Access.

The junction capacity assessment is considered acceptable.

Drawing 103780-PEF-EC-XX-M2-Y-000040 in Appendix N shows the proposed speed limit changes and is welcomed. The KCC Active Travel team have requested that the remaining 50mph section on the A2260 between the 30mph west of the junction with Springhead Bridge, and the Southfleet Road roundabout, is reduced from 50mph to 40mph.

Paragraph 3.2.1 states "*The highway drawings which are to be conditioned identify the Green Corridors route along Thames Way (see Appendix F). This will therefore be delivered by EDC if KCC has not first implemented, and subject to what is achievable within the identified extent of the identified corridor*". This is welcomed.

The example crossings shown on drawings 103780-PEF-EC-XX-M2-Y-000019 P01 and 103780-PEF-EC-XX-M2-Y-000020 P04 should be determined at Reserved Matters Application stage.

Cycle and vehicle parking are to be provided in line with EDC standards and provision will include "*nonstandard and all-ability cycles, such as cargo bikes, tricycles and tandems*". This is welcomed. Electric vehicle charging should be provided in line with the Building Regulations (as a minimum).

It is unclear whether the parameter plan allows for the re-provision of all of the existing bus stops. Please clarify.

The Road Safety Audit Designer's response makes reference to the Green Corridor scheme along the A226 Thames Way. KCC have previously stated this project is on hold and may not be delivered due to ecology issues. Therefore, the points made at 2.3.5 and 2.3.6 are outstanding and should be resolved by the applicant, prior to occupation. Point 5.2.1 should not be dismissed and should be considered at the detail design stage as recommended by the Road Safety Auditor.

Whilst the KCC PROW team are consulted separately, it is noted that the connection to PROW14 from Thames Way to provide an increased direct off road connection, which was

requested by EDC officers and supported by KCC PROW officers, is not being provided. This is disappointing.

With regard to Fastrack, as discussed during the meetings, KCC require the Fastrack route to be implemented as per Option 2, as it provides a direct controlled crossing of Southfleet Road into Whitecliffe and the buses will avoid congestion on Southfleet Road. Option 1 is unlikely to be acceptable to KCC in its current form, especially as it does not give Fastrack priority at the junction.

The tracking for the 18m articulated bus shows overrun of the island at the International Way junction. In addition, this vehicle is not accommodated for in Option 1 as it requires the use of the whole of Southfleet Road to make the turning manoeuvre. All developers accommodating Fastrack are asked to future proof for 18m articulated buses as well as track for the 12.2m electric bus. The design should be amended to accommodate these buses and tracking re-run. Within the main development it would be beneficial if the tracking for each direction was on one drawing so that centre line conflict can be noted. The Fastrack Network Plan in Appendix M looks to be cropped and incomplete.

Transport and Parking Strategy

Paragraph 5.1.6 states that the car club will be implemented after the occupation of 50 residential units or the first employment plot. As per previous comments, it is important for the car club to be operational prior to first occupation in order to establish sustainable travel patterns from the outset.

Framework Travel Plan

Section 3.1 should reference questionnaire surveys as one of the key responsibilities of the TPC.

Paragraph 5.3.5 states that the remedial measures if the targets are not met might include personalised travel planning. Other remedial measures should be set out.

The following amendments should be made to Table 6-1:

There should be a target of 'prior to occupation' for the car club;

One years free car club membership and £50 driving credit should be included; and

The annual vehicle surveys should also be included.

The mobility hub is proposed to be installed within EC2 prior to full build out of phase 1, however, this should be brought forward to first occupation.

Once the value of the S106 contributions (e.g. MAAS credits) have been agreed with KCC, these should be included in the Travel Plan.

Paragraph 4.10.1 of the FTP refers to a Stakeholder Group being established to provide ongoing engagement and review of the Travel Plan. This is welcomed. However, further information should be provided as to the roles and responsibilities of the group. For example, the group should determine if, when and how any of the Transport Fund is to be spent.

The applicant has not agreed to the requested parking surveys of the surrounding roads to monitor ad hoc parking. It is therefore requested that this is included in the Travel Plan as a remedial measure. Should any on-street parking (particularly at Springhead Park) be thought to be attributed to Ebbsfleet Central, this should be investigated by the TPC, with the Travel Plan Fund being used to implement measures that the Stakeholder Group consider appropriate.

For clarity, vehicle targets should be based on the traffic generation set out in the TA, as this is what the transport work was based on.

Conclusion

In conclusion I would like to place a holding objection on the application until the above issues have been resolved. It is noted that the Applicant wishes to engage in further discussions with regards to the proposed financial contributions. KCC welcome these discussions, which are important to clarify before the holding objection can be lifted.

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

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

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

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

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

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

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.