



Application: 20220852

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)

SCREENING OPINION REGULATION 15

To: **Polly Mason
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE**

The screening opinion relates to land situated at

**Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road,
Railway Line, Grove Road And The River Thames, Northfleet, Gravesend**

and being **Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.** Your application dated 11th August 2022 is permitted subject to the following:-

GRAVESHAM BOROUGH COUNCIL MAKES THE FOLLOWING COMMENTS:-

I refer to your submission dated 03.08.2022 submitting a request for an Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development described above. Your request

was accompanied by an 'EIA Scoping Opinion Request (July 2022)' document and a site location plan.

Part 4 (15) (2) of the EIA regulations requires that any request for a Scoping Opinion must include;

(a) In relation to a subsequent application -

(i) a plan sufficient to identify land;

(ii) a brief description of the nature and purpose of the development, including its location and technical capacity;

(iii) an explanation of the likely significant effects of the development on the environment; and

(iv) such other information or representations as the person making the request may wish to provide or make.

Your documents responds to part 4 (15) (2) of the Regulation and I am satisfied that your request is compliant with the Regulations in this respect.

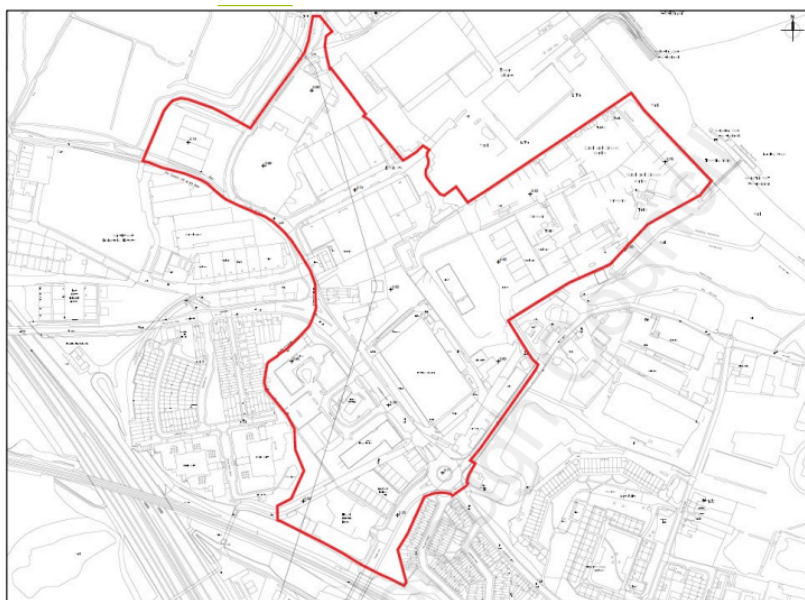
Schedule 4 to the EIA Regulations specifies the information that an Environmental Statement (ES) must provide. The ES must include the information referred to in Schedule 4 and should include such of the information as is reasonably required to assess the environmental effects of the development and to which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile.

In this instance, the level of detail of the proposed development provided is limited to the red line boundary and a description of the main elements. Whilst access is not to be a reserved matter, it is not clearly set out within the report that this will be from the A226. It is assumed for the purposes of this Scoping Opinion that this will be the case. Little detail is also provided of the form the development would take at this stage nor how the multi-use stadium would operate. Whilst it is noted that the applicant intends to provide an indicative phasing plan with the application, no information has been provided as part of this Scoping exercise. Phasing could have implications for environmental impacts that may need to be investigated further at the application stage. This Scoping Opinion is therefore issued on the basis of the information provided in your Scoping Report and the responses received from consultees only and aspects may need to be revisited as the scheme progresses towards submission.

Site Description

The application site is approximately 19 hectares situated within Northfleet and forms part of Northfleet Industrial Area. The site adjoins the Ebbsfleet Development Corporation (EDC) administrative boundary to the east/west and Dartford Borough Council to the west. The Scoping Report states that the development would be centred around the National Grid's asset (NGR) TQ 61457 75002. This is assumed to be the pylon lying adjacent to the Swanscombe End stand at the football ground.

An indicative application red line boundary is provided in the Scoping Report as shown below:



The north-eastern portion of the site fronts the River Thames and lies opposite the Port of Tilbury within the Thurrock Borough Council area. Directly opposite around 930 metres distant is the main lock entrance to the dock complex, through which ships enter the impounded docks at times dependent on the tide. To complete this manoeuvre, ships are turned in the river assisted by tugs.

The eastern boundary of the site at this point does not immediately abut Robins Creek, leaving a narrow margin of land at the edge of the Creek and a nob of land immediately adjoining the tidal flood defences. As this land lies outside the indicative red line boundary, it is unclear what the ownership of this land will be or how it will be maintained in the future. A wharf projects into the river from this area currently used for the importation of aggregates although this is not within the red line boundary either.

This wharf is known as Robins Wharf and together with land included in the red line boundary is a safeguarded wharf in both the adopted Kent Minerals and Waste Local Plan 203-30 Early Partial Review 2020 and the Gravesham Local Plan Core Strategy (2014).

The A226 Stonebridge Road runs through the proposed application site, with the Ebbsfleet United football ground (Kufflink Stadium) and a construction company yard lying to the north-east. Beyond this and extending up to the Robins Wharf aggregates site are industrial premises accessed from Grove Road. To the eastern end of the football ground lies a car wash facility, a tyre sales company and a dental services company.

The Ebbsfleet Stream here runs in culvert between the football ground and these businesses, emerging at the southern end of Robins Creek, an impounded water body due to the building of the flood defences in the 1980s. The culvert continues to the south of the Stonebridge Road roundabout east of the A226 Thames Way and west of the rear of residential properties in Railway Street. The Ebbsfleet Stream drains through this culvert with water entering south of the railway before draining into the Thames via Robins Creek.

The application site extends to the north-west of the football ground into Lower Road at the Galley Hill Road traffic lights. Here it includes the four residential properties immediately abutting the junction and a range of industrial premises extending out towards the Swanscombe Peninsula SSSI. Lower Road serves a number of large commercial properties to the east side of the Peninsula in Gravesham, whose access relies on the Galley Hill junction. Immediately abutting the proposed application site within Dartford Borough are industrial premises set within a former quarry once occupied by paper mills. These also gain access to the A226 via the Galley Hill Road junction.

To the south west of the A226 Stonebridge Road, opposite the football ground, the proposed application site extends as far as the boundary with Dartford Borough and the Ebbsfleet Development Corporation area. This area is occupied by a Shell Petrol Station with small ancillary convenience store; the Ebbsfleet Industrial Estate; the former Renault Priory car dealership, now

subdivided and used as a gym/Costa Coffee/small convenience store/industrial type use; and a main Ford car dealership.

Beyond this within Dartford Borough lies a major residential development constructed on the site of the former Korsnas paper sack factory and older residential premises in Taunton Road and on Galley Hill Road.

This area along with the proposed application site is severed from the Ebbsfleet Valley to the south by the North Kent Railway line, with HS1 lying beyond this towards the village of Swanscombe. The A226 passes under the North Kent Line via Thames Way, with Stonebridge Road and Grove Road providing access to the urban area of Northfleet to the east. This area includes the Northfleet Embankment East development site (up to 532 units) being marketed by Bellway as Harbour Village. The Ebbsfleet Development Corporation also has aspirations to bring forward further development on its Grove Road site on land currently occupied by industrial uses adjacent to Robins Creek. The Grove Road site is allocated in the Gravesham Local Plan Core Strategy for approx. 200 residential units.

Transport linkages in this area are good with train stations at Northfleet (North Kent Line) 150 metres from the proposed application site and Ebbsfleet (HS1) 0.5km distant. Regular *Fastrack* bus services pass along the A226 to Ebbsfleet and onwards to Gravesend, with proposals to further improve services eastwards along the riverfront to link major development sites. Conventional bus services also link the site to Gravesend via Northfleet. Given proximity to the major proposed development at Ebbsfleet Central and adjoining existing communities the potential exists to exploit active travel modes such as walking and cycling. Proximity to the river also provides potential for sustainable transport during both the construction and operational phases of any development in this location.

Proposed Development

The EIA scoping opinion relates to the forthcoming outline application with all matters reserved (except for access); for the following;

- mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works;
- 3,500 residential units (Use Class C3)
- up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages;
- up to 18,000 sqm (GEA) office floorspace;
- up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities;
- up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1);
- up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F);
- delivery of circa 3.8 hectares of open space;
- the realignment of the A226 Galley Hill Road / Stonebridge Road;
- some sui generis uses;
- hard/soft landscaping;
- car and cycle parking;
- highways works, infrastructure provisions with ancillary works.

The document maintains the proposed development constitutes 'EIA development' as it exceeds the thresholds set within 'Schedule 2, 10(b) (Infrastructure Projects – Urban Projects)' of the Environment Impact Assessment (EIA) Regulations, taking into account the scale of the redevelopment and the nature/sensitivity of the site and surrounding area, and there is potential for significant environmental effects to arise.

The LPA would agree that the development would fall within parameters of Schedule 2 development and that EIA is required in this instance. It should also be noted that because of proximity to Ramsar/SPA areas east of Gravesend there is potential here for residential development to result in increased visitor numbers and hence bird disturbance to take place on the North Kent Marshes. As a result, in determining any application, the LPA would have to undertake

an Appropriate Assessment under the Habitat Regulations. The applicant will also need to take this into account in preparing the submission and should discuss detailed requirements with the LPA and Natural England.

Responses from External Consultees

KCC Archaeology

The site lies within an area of very high, multi-period, archaeological, geoarchaeological and palaeoenvironmental interest, where the Ebbsfleet valley meets the Thames. This is recognised in the Scoping Report so that cultural heritage and archaeology will be scoped in to the EIA process. The importance of geoarchaeology as well as early and later prehistoric archaeology is recognised in the Scoping Report, but this archaeological and palaeoenvironmental interest and potential could be very complex and include archaeological remains of national or international importance. They recommend that the ES includes a detailed impact assessment based on both desk-based assessment and field evaluation. The archaeological desk-based assessment would include a review of all existing borehole data for the site and the immediate surroundings (within a 500m study area from the redline boundary of the site). The field evaluation would comprise purposive boreholes to ground truth and develop a deposit model for the site and this geoarchaeological and palaeoenvironmental evaluation would need to be undertaken by specialists approved by the Local Planning Authority.

The Scoping Report recognises the importance of the post-medieval and modern industrial heritage of the site and I recommend that as well as considering Aspdin's kiln under 'Built Environment', it and the cement industry, also need to be considered as 'archaeology'. The industrial archaeology of the site and area will comprise both above and below-ground heritage assets with archaeological interest. The results of recent and ongoing work to the south and east of Grove Road will be important sources of information, some of which may not yet be on the HER but are available through the EDC planning portal.

The ES should include consideration of potential positive benefits of the scheme to learn more about the heritage of the site and the opportunities to promote and communicate this heritage to residents and visitors.

KCC Lead Local Flood Authority

The LLFA understand from the Water Resources and Flood Risk Chapter (including surface water drainage) that these considerations are taken out of the EIA Scoping Opinion and will instead be covered in a separate report as part of any future planning submission. Overall, they accept this approach.

The LLFA acknowledge statements 409,424 and 428 in regards to adhering to national and local planning guidance, incorporation of SuDS measures into the development and further consultation with the LLFA will be undertaken to discuss flood risk.

In addition to those policies referenced in statement 409, the LLFA would request the following KCC Policies are considered for designing a future surface water drainage scheme:

- Kent County Council's Drainage and Planning Policy Statement (2019);
- Kent Design Guide Making it Happen- Appendix C2 Drainage Systems.

KCC Biodiversity Officer

KCC Biodiversity Officer has commented that the submitted information has detailed that a preliminary ecological report has been carried out on site and as a result the following is proposed to be carried out:

- Assessment of impacts the proposal will have on the adjacent Swanscombe Peninsula SSSI

- Assessment of impacts to the LWS adjacent and within 2km of the site
- Assessment of impacts to the SSSI, SPA, Ramsar and NNR within 10km of the site.
- Assessment of impact
- Breeding bird survey
- Wintering bird survey
- Assessment of the quality of the Mud flats.

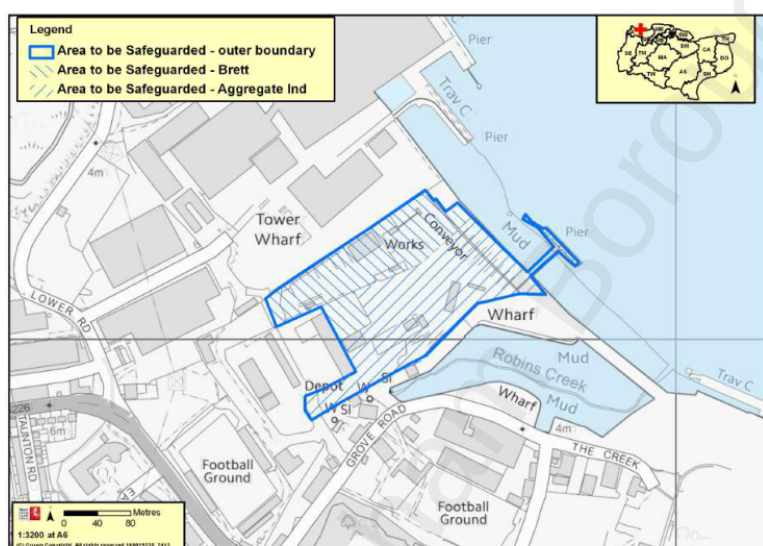
The submitted information has confirmed that the assessment will assess impacts from construction and operational phase of the proposed development. Although, in regard to the EIA, no specific comments have been made.

Comments have received in relation to artificial lighting and further enhancements, but these are mostly in relation to the application stage.

KCC Minerals Management

The comments from KCC Minerals Management department are principally concerned with the aspect of the forthcoming Northfleet Harbourside development, as it would directly affect the safeguarded mineral importation facility, known as, Robins Wharf (please see full comments on the Council's website). This area is identified as Site G in the adopted Kent Minerals and Waste Local Plan 2013-30 Early Partial Review 2020 (KMWLP), as extract of the site is listed below;

Site G: Robins Wharf, Northfleet



It has been highlighted by KCC Minerals Management that Policy CSM6: Safeguarded Wharves and Rail Depots is the relevant safeguarding policy of the KMWLP (2020), as Robins Wharf, Northfleet is identified as an operational site. Therefore, the safeguarded site (a mineral importation wharf) is protected from direct loss, or it being made unviable by allowing incompatible development to occur in its proximity (within 250m is the policy's stipulation) that may cause the continued viable operation of the facility adversely affected. This to include its maintenance of adequate accessibility, if the proposal is indeed to the loss of the safeguarded site, then this would have to be successfully argued by invoking an exemption from the presumption to safeguarded by meeting the requirements of Policy DM8: Safeguarding Minerals Management, Transport Production & Waste Management Facilities.

In light of the above, KCC Minerals Management concluded the following;

'It is assumed that the Northfleet Harbourside proposals would directly be in conflict with the presumption to safeguard the mineral importation facility. Therefore, any planning application would have to include an Infrastructure Assessment (IA) to argue, evidentially, why an exemption criterion, (1 to 7 as shown above) can be invoked.'

KCC Waste

In relation to the Waste, KCC maintain that as they are the Waste Disposal Authority, they are effectively required to dispose of kerbside collected waste and also provide a service for householders to dispose of any additional waste brought directly to one of its recycling centres that services Gravesham. At present, KCC maintain they are already at capacity.

KCC have noted that waste / materials have been scoped-out of the EIA as the significant effects relating to waste and materials are considered unlikely, although, they do not agree with this approach. KCC's overall position is waste management and recommends that the matter is addressed within the EIA/ES, alongside the development of a Waste Disposal Strategy. KCC maintain that this Strategy should be developed and mitigation to be agreed with GBC and KCC as Waste Collection Authority and Waste Disposal Authority accordingly.

KCC Traffic and Highways

In relation to the KCC Highways, they make the following comments;

'The County Council, as Local Highway Authority, has been involved in initial meetings with the applicant's transport consultant to scope the requirements of the Transport Assessment to determine the likely trip generation, distribution and potential mitigation of any impacts in accordance with National Planning Policy Framework. The development is of sufficient scale and in a location which provides an opportunity to deliver some significant infrastructure and service improvements, and the applicant has encouraged to take advantage of the KCC Kent Transport Modelling Service.'

KCC Education

With regards to the socio-economic chapter of the proposed ES, KCC have provided comments from Education. The comments mostly refer to the scale of the development and the impact from the 3,500 units proposed, an extract of their comments are provided below;

'The current capacity for both primary and secondary provision is at, or near, capacity across much of the Boroughs of Gravesham and Dartford. This is borne out by the latest projections received for primary school provision in both Dartford and Gravesham, and it is clear that a development of this size would result in the need for additional primary school places.'

In light of the above, KCC go on to provide tables to demonstrate the proposed deficit that would result from the proposed development on local schools. Notwithstanding this, the LPA consider these matters are to be dealt with within the parameters of a planning application, although, it would be useful for the applicant to take note of the comments from KCC in relation to Education provisions. Full comments are available to view on the Council's website.

KCC Sport / Recreation

With regards to the socio-economic chapter of the proposed ES, KCC have provided comments from Sport / Recreation. KCC recommend that the applicant ensures opportunities for active travel are integrated into the development to enhance connections between services and communities, and limit car use where possible. The development must also deliver adequate provision for traditional sport as well as informal activity, play and recreation and consider how these spaces are accessed.

Notwithstanding this, the LPA consider these matters are to be dealt with within the parameters of a planning application, although, it would be useful for the applicant to take note of the comments from KCC in relation to Sport provisions. Full comments are available to view on the Council's website.

The Marine Management Organisation (MMO)

The comments from Marine Management Organisation (MMO) are mostly advisory comments (please see full comments on the Council's website).

In relation to the Environmental Impact Assessment the MMO made the following comments;

'If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the Marine Works (Environment Impact Assessment) Regulations 2007, as amended, are considered adequately at the following link:

<https://www.gov.uk/guidance/make-a-marine-licence-application>

Port of London Authority (PLA)

The comments from the Port of London Authority are mostly advisory and have particular regard to the loss of Robins Wharf which is operational and, in use by two separate operators. With this regard, the PLA maintain they would, therefore, strongly object to any forthcoming planning application that includes the proposed loss of this safeguarded site, and it is disappointing that this wharf has not been directly referred to in the Scoping Report or any initial justification provided for the proposed loss of this vital facility.

Notwithstanding the above, the PLA also maintain that, it is also important to note that any development located in close proximity to a safeguarded wharf would, in line with the KMWLP and the associated Kent Safeguarding Supplementary Planning Document (SPD) (2021) need to demonstrate that all impacts including noise, dust, light and air emissions, that may arise from the activities taking place at the wharf would not be experienced to an unacceptable level by future occupants. This is particularly important as these wharves can operate over 24 hours a day in line with tidal movements and would also be in line with paragraph 187 of the National Planning Policy Framework (NPPF) (2021).

In summary the PLA would strongly object to any forthcoming planning application that includes the proposed loss of the safeguarded wharf at Robins Wharf. It is disappointing that there hasn't been any communication or consultation with the operators at Robins Wharf or the PLA prior to the submission of this Scoping Report and it is recommended that the applicant makes contact with all relevant stakeholders as part of this proposed development at the earliest opportunity.

National Highways (NH)

With regards to the proposed development, National Highways will be concerned with the proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A2 and the M25 Junctions 1a, 1b and 2 (please refer to the full response on the Council's website).

National Highways did not explicitly comment on the significance of Traffic/Highways, but did express their concerns as stated above. Therefore, no explicit comment was made in relation to whether an EIA is required, but stated that any Environmental Statement should be consistent with any Transport Assessment submitted.

NH also provided some additional guidance set out below:

TA/EIA General Guidance

Any TA and EIA assessment should be undertaken in accordance with the DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".

The TA should include a robust assessment of the vehicular impacts "with" and "without" development for the Opening Year and a Review Period year which will be either the end of the relevant Local Plan or ten years post registration of the planning application, whichever is the greater, to assess the impact of the proposed development.

If it is likely that any SRN mitigation will be required, the EIA must demonstrate how it accords with the Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring, and we note that the latter document is referenced in bullet point 3 of paragraph 492, under EIA Approach and Methodology.

It should be noted that on 20 July 2022 we responded to a pre-application Transport Assessment Scoping Note setting out our more detailed and specific requirements. These comments remain applicable.

Construction Impacts

Paragraph 39 of the EIA report outlines that any demolition or construction related impacts will be mitigated and managed through an appropriate Construction Environmental Management Plan. This approach is welcomed, and we request that the document be reviewed and agreed in writing with the Local Highways Authority and us.

Ebbsfleet Development Corporation (EDC)

The comments from EDC are mostly in relation to the merits of the forthcoming planning application which could be of use for the applicant. These will be summarised below, however, please refer to the full comments listed on the Council's website. In regards to the forthcoming Environmental Statement, EDC mentions that the cumulative impacts resulting from the development on the local highway network and the subsequent impact that the proposed development, including any necessary mitigation, would have on the viability and deliverability of development sites within the EDC area.

EDC comment on the following;

'A Key issue for EDC (as landowner and LPA) will be the impact of the proposed development on Thames Way (A226), noting that this road would provide the most direct route between the application site and the strategic road network (A2) but which also runs through the heart of the allocated Ebbsfleet Central site. Whilst land is safeguarded for potential future dualling of Thames Way, it would be necessary to consider effects on the viability of planned development at Ebbsfleet Central and on providing further severance between Northfleet and planned facilities and services within Ebbsfleet more generally'

EDC also mention;

'Scope of the Environmental Statement Due to the low lying nature of the proposed site and its location directly adjacent to the River Thames, as well as its interface with Northfleet Harbour and the culverted River Ebbsfleet, it is reasonable to expect that the scale and nature of development proposed has the potential for significant environmental effects in respect of water resources, flood risk and drainage. While the expectation would be for this topic to be scoped into the Environmental Statement, this is a matter for the Borough Council to determine following input from organisations such as the Environment Agency and the Lead Local Flood Authority'

With regards to climate change, EDC are of the view that climate change, including the impact of the proposed development on climate change, is scoped into the EIA. They also suggest that;

'A key aspect of this will be ensuring optimal environmental performance of all proposed buildings through a combination of factors including building fabric, design/orientation and means of energy generation, and we support this being scoped in'.

EDC are also mindful that the Scoping Report 'refers to the site being located within a Mineral Safeguarding Area but it does not appear to acknowledge that it comprises safeguarded mineral wharf infrastructure, i.e. Robins Wharf, the extent of which is identified as Site K in the Kent Minerals and Waste Local Plan (KMWLP) 2020. The extent of the aggregate facility shown in Figure 4, which does in part fall within the EDC boundary, does not appear to be correct. The Scoping Report refers to the proposed removal of the aggregate works so it is evident that the proposals would be in direct conflict with the presumption to safeguard the mineral importation facility so is an issue to be addressed as part of the application.

Thurrock Council (TBC)

The comments from TBC are summarised below, however, please refer to the full comments listed on the Council's website.

Thurrock context

- there is an Air Quality Management Area (no. 24) also located c.2.1km to the north-east of the application site, at Dock Road / Calcutta Road / St. Chads Road, Tilbury. This AQMA is designated for NO2 from road traffic;
- there are a number of major hazard site with Thurrock, including sites with the Port of Tilbury;
- there is also an 'explosive interest' within with Port which may affect the north-eastern corner of the application site.

Potential for significant impact on receptors within TBC

TBC mention the following:

'Further to the wording of paragraph no. 154 above, it is essential to note that land-uses within the proposed development may themselves be receptors to noise emissions from sources within Tilbury Docks. As noted above, the river frontage of the application site is located opposite the harbour lock entrance and riverside berths at the London Container Terminal. Within the wider Port complex are a number of operational berths, working around the clock, which generate noise as well as noise created from on-board ship generators – which can run continuously. *Although a distance of c.700m separates the application site from the Port, the River Thames is clearly an 'open' corridor and may act as a reflector of noise emissions. I would suggest that noise monitoring positions (Figure 12 of the EIA Scoping Opinion Request) should be chosen to monitor noise generated by the Port.*' (GBC emphasis added) 'If noise sensitive land-uses are proposed on or close to the river frontage of the application site, then the ES should undertake a robust assessment of the impact of noise generated by the Port on those receptors. The Port of Tilbury is a 'statutory' harbour undertaker, benefitting from permitted development rights and has been operational since the 1880's. *Therefore I consider that the 'Agent of Change' principle would apply to place the responsibility of mitigating the impact of any noise nuisance from the Port (as an existing noise generating use) on the proposed new development.*' (GBC emphasis added)

Dartford Council (DBC)

The comments from DBC are summarised below, however, please refer to the full comments listed on the Council's website.

Initial comments

- The red line boundary has been outlined in an arbitrary way, as it follows the Borough boundary line between Dartford and Gravesham and the boundary between Dartford and Gravesham and the boundary between Gravesham and Ebbsfleet Development Corporation (EDC as the Local Planning Authority for this part of Dartford Borough). There appears to be no planning reason for the chosen boundary line and there are concerns that a development brought forward in this way will be unjustifiably constrained or matters outside of the redline will not be mitigated fully;
- The description of the proposed development includes "re-alignment of Galley Hill Road" but the red line excludes this road extending through the junction of Galley Hill Road/Lower Road/Stonebridge Road. The red line should include all those matters listed on the description of development for which planning permission is sought.

Cumulative assessment

DBC note that para. 50 of the Scoping Report considers the cumulative impact of other schemes within 1km of the site and maintain this is inadequate for an EIA. They further assert other impacts, such as traffic and transportation, a much larger area should be considered for cumulative assessment.

DBC are also of the view that cumulative assessments should include committed developments i.e. planning permissions within a defined area and developments as set out in the Local Plan.

Traffic, Transportation and Cumulative Impacts

The transport arising from the development has been raised by DBC as a significant issue, but they also further stress the cumulative impacts of transport with other development should be

considered. Overall, DBC are critical of the methodology regarding Cumulative impacts, as suggested above.

With regards to committed developments and traffic/transportation, DBC does not agree this has been sufficiently considered and that Dartford and the EDC should be approached for details of committed development in their respective areas. Otherwise, they maintain that 'failure to consider cumulative impacts from committed development will render the ES incomplete in the assessment of cumulative impacts.'

Other Issues

There are more issues suggested by DBC, but in relation to the ES;

'The scheme is likely to result in significant increased traffic levels along London Road and Galley Hill Road. This road has many sections that are adjacent to cliff faces and these are known to be at risk of chalk spalling. The ES should consider the impact of additional traffic on this road and on the stability of the cliff spine that supports the A226.'

Health and Safety Executive (HSE)

The HSE reference the Town and Country Planning (Environment Impact Assessment) Regulations 2017, Regulation 4(4) – which specifically relates to the vulnerability of the proposed development to major accidents. The specific comments of most relevance are;

- Point 2: the development is located within the safeguarding zone of an HSE licensed explosives site Port of Tilbury London Limited, Essex. With regards to this HSE suggest;

Depending on the type of development if planning permission were granted HSE may need to review the license which may impact on the viability of the licensed explosives site. The licence holder should be consulted, then the licence holder explosives site. The licence holder should be consulted, then the licence holder can discuss any potential impact on the license with HSE. For a fee, pre-planning advice can be obtained from the HSE's Explosives Inspectorate explosives.planning@hse.gov.uk

- Point 6: If the buildings up to 20 storeys in height, mentioned in paragraph 22 of the Scoping document, will include dwellings or education accommodation (meaning if they will be a 'relevant building' under 'planning gateway one'), then a fire statement setting out fire safety considerations will be required with the planning application.

Natural England (NE)

Natural England provide standing comments which are generic and advise on the general information on what should be scoped into the EIA. No specific comments have been received on what details should be scoped-in the forthcoming EIA scoping opinion. Please review Annex A of Natural England's response for further advise.

Historic England

HE mention the following;

'The Scoping Report separates archaeology (which is taken to be below-ground assets) and built heritage (which is taken to be above-ground assets).'

This separation of 'above' and 'below' ground heritage assets is inappropriate in this case. The scheduled monument of Aspdin's Kiln (1004227), which survives well above ground is part of a much larger 19th century cement works which extended along the south bank of the River Thames. The industrial archaeology of the site and area will comprise both above and below-ground heritage assets with archaeological interest. Historic England consider that the archaeological assessment cannot therefore be limited to below ground remains.'

And that;

'Despite this contradictory information, Historic England understand that it is not proposed to scope in built heritage to the ES and that a TVIA would be produced and appended to the ES. While we acknowledge that the effects in EIA terms on nearby designated built heritage could be low, we do not agree that this means it should be scoped out of the ES as the information available at this stage is not sufficient to make this assessment with any certainty. (Council emphasis)

The 1km study area has been used for both archaeological remains and built heritage. Historic England agree that the 1km study area is likely to be proportionate for the below-ground archaeology topic, however we also think that the 1km study area for built heritage is far too restrictive for a development of this scale.

We suggest this must be significantly enlarged and should include, but not be limited to, the following:

- *Tilbury Fort, a scheduled monument and the grade II* listed Riverside Terminal*
- *designated heritage within the town of Gravesend, including conservation areas like Windmill Hill and listed buildings like the grade II* listed Church of St George*

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.'

In addition to the above, HE suggest that a TVIA to supplement the ES, should also include views from more distant designated assets, in addition to the application already intends to assess. HE are also of the view that the ES should also consider the potential impacts on-designated features of historic, architectural, archaeological or artistic interest as these are also of national importance and make important contributions to character of an area and the sense of place.

Assessment

The Scoping Report provides a basis and framework for assessing the overall environmental effects of the development. This response is structured around the sub-headings presented in the Scoping Report informed by input from statutory and non-statutory consultees. In addition to the summarised comments from the consultees above, the full responses received are appended and should be reviewed alongside this Scoping Opinion.

Demolition and Construction

The Scoping Report maintains that that the ES (within a non-technical chapter titled 'Demolition and Construction') will provide an outline of the anticipated demolition and construction programme and related activities and aspects. These related activities being indicative programme phasing, demolition and enabling works, substructure works, superstructure works etc, demolition waste volumes and construction material quantities, HGV movements and HGV routing.

The LPA welcome the approach taken, particularly at paragraph 36, that the potential significant effects arising during the demolition and construction works will be addressed within each of the individual technical assessment chapters of the ES and will be assessed against the existing baseline conditions. It is intended that the ES will set out the demolition and construction related effects both without mitigation measures included (unless embedded mitigation measures have been identified) and with mitigation measures applied. This approach will allow any 'residual effects' to be identified as part of the assessment.

The assessment will take into consideration any other surrounding developments which are likely to be under construction at the same time as the Proposed Development. These are likely to include the developments at Northfleet Embankment West/Grove Road; any works related to the industrial commercial development (including the Bulk Aggregates Import Terminal) to the east; the Ebbsfleet Central development; the continued build out of Eastern Quarry and other developments in Dartford.

The management and form of environmental impacts that might occur is likely to be affected by the phasing of the development and in particular how and when the site is cleared or remediated; what uses will remain on site at what stages; and what areas become occupied at what stage by

potentially sensitive receptors. There is also potential for adjoining occupiers to be adversely affected during the construction and demolition stage and this will also need to be addressed. How such issues will need to be clearly addressed in the ES.

In addition, should the Lower Thames Crossing (LTC) or London Resort be granted Development Consent, it is likely that these would be progressed alongside this and other developments. The implications of this will need to be clearly set out within the ES along with how significant impacts will be avoided, managed or mitigated. Attention is drawn in particular to the fact that the construction of this proposal alongside LTC has the potential to impact adversely on the two main east-west routes through Gravesham and onwards to Dartford and the M25/A282 Dartford Crossing.

In order to reduce impacts during the construction and demolition phase, the applicant is also strongly advised to consider the potential to use water borne transport given the riverside location as a means of reducing HGV movements on the local road network.

Completed and Operational Development

Paragraph 42 of the Scoping Report states that a similar approach will be applied to the assessment of potential impacts as at the demolition and construction stage - i.e. that the ES will set out the completed and operational related effects both without mitigation measures included (unless embedded mitigation measures have been identified) and with mitigation measures applied so as to allow any 'residual effects' to be identified as part of the assessment. This approach is welcomed..

Scoped Out (topics):

It is noted from the Scoping Report that the following topics are scoped out of the EIA;

- i. Water Resources , Flood Risk / Site Drainage;
- ii. Waste and Materials;
- iii. Project Vulnerability

After due consideration and having regard to responses received from consultees, the LPA has come to the following conclusions as to whether these aspects should be 'scoped in' or 'scoped out':

i. Water Resources, Flood Risk / Site Drainage

Given the scale of the development and as the site lies within Flood Risk Zone 3a (areas benefitting from flood defences) where a significant residual flood risk exists from tidal inundation should an extreme event occur, the LPA is of the view that Water Resources, Flood Risk and Site Drainage **should be scoped into the ES**.

The LPA notes the comments from EDC which maintain '*it is reasonable to expect that the scale and nature of development proposed has the potential for significant environmental effects in respect of water resources, flood risk and drainage*'. The position of the EDC in this respect is understandable given both this site and land to the south form part of the Ebbsfleet Valley where development in either area has the potential to impact on the other.

It is noted para. 426 of the Scoping Report maintains that it is considered unlikely that any foundations/piling works proposed at the site will cause significant disruption to the groundwater table that could result in result in water supply to local abstractions being inhibited. This is primarily because of the distance from surface water and ground water abstraction points.

Reference is made within the Scoping Report to the provision of a Construction Environmental Management Plan (CEMP) which the LPA would expect to see address site drainage and flooding issues as the development is built-out on a phased basis. It is also noted that reference is made within the Scoping Report to the potential for surface water run-off to increase during both the construction and operational phases primarily due to the increase in impermeable surface areas. For the completed development in particular this would be addressed through the proposed surface water drainage strategy.

Both national and local policy require that a site specific flood risk assessment (FRA) should be submitted in support of the proposed application. This will need to have regard to the latest climate change projections available in UKCP and will need to consider whether or not flood risk is increased elsewhere as a result of the development. Due to the location of the site; its potential to increase flood risk on adjacent sites; the fact that how the drainage system in the area currently functions is unclear and lack of detail on what interventions are proposed at this stage, the LPA does not agree that Flood Risk and Site Drainage should be scoped out of the ES.

Any assessment will also need to consider the cumulative impact of the proposal having regard to other schemes and clearly set out what improvements are proposed to the flood defences to protect the site over its lifetime and how those improvements will be phased. Given the residual risk of flooding, it may also be prudent to consider whether the application should be supported by or contain a commitment to a Flood Risk Management Plan and the incorporation of flood resilient design features.

Whilst the Environment Agency has not provided a detailed response to the EIA Scoping Report, the applicant is strongly advised to engage with them using their paid pre-application advice service if necessary. The applicant is also advised to engage with Kent County Council as Lead Local Flood Authority in this respect. Whilst the site is not within the Ebbsfleet Garden City area, the LPA notes that the Development Corporation is looking at this within its own sites and would encourage the applicant to work with them so that this development can be brought forward using a comparable approach.

In terms of water infrastructure such as supply and foul drainage, the Scoping Report refers to both Affinity and Thames Water. This area is actually served by Southern Water and the applicant is advised to engage with them regarding capacity and how connections are to be provided. For information, in terms of surface water drainage the default position is that this should be dealt with through a Sustainable Urban Drainage System given this can also be linked to water re-use and other benefits in terms of Green and Blue Infrastructure..

The Marine Management Organisation has not commented on this area of this Scoping Report but will be a statutory consultee when the planning application is submitted.

Whilst not directly related to this part of the ES, it is noted that the site will have a river frontage likely to require upgraded defences and with public access. Given the risks to the public that may arise as a result of public access, attention is drawn to the probable need to include riparian lifesaving equipment at the guidance issued by the PLA in this respect - see <http://pla.co.uk/Safety/Water-Safety/Water-Safety>.

In the event of the flood defences being upgraded opportunities to improve the biodiversity of the river frontage should also be explored. In this respect, attention is drawn to the Estuary Edges guidance at <https://www.estuaryedges.co.uk/>

ii. Waste and Materials

The Scoping Report maintains that the quantities of materials for the construction of the Proposed Development are not known, at this stage. For the construction phases, it is proposed that mitigation measures will be implemented, as outlined in para. 447, and deems that significant adverse effects associated with the construction of the Proposed Development on materials would be unlikely. For these reasons, materials has suggested to be scoped out.

It is assumed that the project would be guided by a Construction Waste Management Plan to reduce waste during this phase and, inter alia, the carbon footprint of the project. The applicant is also asked to consider ways and means to reduce embodied carbon within the development where feasible to do so. Whilst the site is not within the Ebbsfleet Garden City area, the LPA notes that the Development Corporation is looking at this within its own sites and would encourage the applicant to work with them so that this development can be brought forward using a comparable approach.

For the operational phases, the comments from KCC, as Waste Disposal Authority, for both kerbside waste and recycling centres that the EIA should have consideration of the capacity of

existing disposal facilities and recycling centres. At present, KCC maintain that the recycling centres are already at capacity.

For reasons above, and the scale and nature of residential, mixed use and commercial developments proposed at the site, it is considered these could potentially create significant pressures to existing waste/recycling facilities. Despite the mitigation measures proposed for both materials and waste, the LPA consider that these **should also be scoped into the ES**.

iii. Project Vulnerability

The Scoping Report makes reference to the project vulnerability and it is generally held that due to the nature and the surroundings of the proposed developments, many of the events listed on the London Risk Register (developed by the London Resilience Partnership) are not considered relevant or likely to pose a risk to future site users or surrounding receptors.

It is unclear why the Scoping Report refers to the London Risk Register, given the site is clearly not in London. It is suggested that the ES should instead refer to documents published by the Kent Resilience Forum on its website at <https://www.kentprepared.org.uk/about-us>. For information, the Kent Community Risk Register major coastal and tidal flooding in the very high risk category for natural hazards.

It is noted that the Scoping Report acknowledges the project's vulnerability to major accidents and natural disasters and that this should be considered both in terms of the likelihood of the project itself to cause a major man-made accident and in terms of the project being affected by an external man-made accident or by a natural disaster. It also takes into consideration the impacts of proposed design or operation that could effectively worsen the potential events on nearby receptors.

The Scoping Report concludes that the vulnerability of the Proposed Development to major accidents and natural disasters will be adequately managed throughout the lifetime of the project/ Furthermore, it is held that, in terms of vulnerability of the proposed development to such events, it is itself, unlikely to result in any significant effects on introduced site users and surrounding environmental and human receptors.

However, the comments from HSE and Thurrock Borough Council are of relevance here. HSE maintain that, as the development is located within the safeguarding zone of a HSE licensed explosives site at Port of Tilbury London Ltd, Essex. Furthermore, Thurrock Borough Council reference the proximity of the site to the major hazard site at the Port of Tilbury that could potentially increase the vulnerability of the proposed development.

This aside, the proposed application site lies within EA Flood Zone 3A, where there is a residual risk of tidal flooding during an extreme tide surge event. In addition to introducing a significant new population into this area, the proposal includes the construction of an 8,000 seat capacity multi-use stadium with few details at this stage as to how it would operate and function. In addition, a significant quantum of retail and food and drink type uses are also proposed that would also act as attractors.

Therefore, with regards to the vulnerability of the development, in accordance with Part 5, Regulation 25, of the EIA (2017) regulations, the LPA cannot agree that the projects vulnerability from external man-made accidents/natural disasters can be scoped out. The LPA considers that this **should also be scoped into the ES**.

iv. Health

It is noted that Health will be scoped into the ES but that a technical ES chapter will not be prepared. Instead, a Health Impact Assessment will be submitted. Given the nature of the existing site and surrounding sites and the fact that the development will be phased, the LPA considers that health should not be scoped out of the demolition, construction or operational phases of development. In terms of the operational phases of the development, the proposal will also result in a significant uplift in population and increased demand on medical services. The LPA is not convinced therefore in the absence of a proper consideration of likely impacts (which may actually be beneficial if it results in better service provision for existing deprived communities) that

it would be unwise to scope health out of the ES. The LPA therefore concludes that health **should be scoped in** and invites the applicant to engage with it to define what the Health Impact Assessment should cover.

v. *Solar Glare and Light Pollution*

It is considered that it would be appropriate to cover the light pollution and solar glare in the operational stages of development within the EIA. During the demolition and construction phase, the LPA would expect this to be covered by the CEMP for the site.

The applicant's attention is also drawn to the location of the site on the riverfront, directly opposite the lock entrance to Tilbury Docks where ships are manoeuvred by tug to enter and leave the impounded docks. This is also an area where ships manoeuvre onto wharves to load and discharge cargos during hours of darkness as the tide allows. Any appraisal of the potential for light pollution therefore should have regard to navigational safety on the River Thames and the applicant is advised to engage with the PLA to discuss this aspect.

Scoped In (topics):

In terms of the topics **to be scoped into** the EIA, LPA agrees the broad scoping of these topics. However, the LPA would like to comment on the following;

i. *Archaeology / Townscape, Visual and Built Heritage*

Notwithstanding the comments from KCC Archaeology, the comments from Historic England highlight that archaeology (usually below ground) and built heritage (usually above ground) assets have been separated into two separate fields, with the latter being scoped out.

Historic England do not find this approach useful, with reference to the scheduled monument of Aspdin's Kiln (1004227) and the nature of industrial archaeology of the site/area as this will comprise both above and below-ground heritage assets with archaeological interest. HE further comment that the 1km study area is too restrictive and should include developments such as the grade II* listed Riverside Terminal, Tilbury Fort, and designated heritage assets within Gravesend, such as the grade II* listed Church of St George.

Some of the buildings are proposed be up to 20 storeys, which would be of significant height compared to surrounding developments and would be visible from a considerable distance. HE therefore consider that the envelope for the visual impact assessment should be increased and the LPA concur with this view.

The applicant is therefore advised to engage with the LPA to agree the area to be covered by the visual impact assessment and a list of those heritage assets/townscape/river views that should be considered. In terms of river views, the applicant is also reminded in policy terms that both marine and terrestrial policies will apply when the application is assessed. The applicant is also advised to agree of list of designated/non-designated/archaeological assets with the LPA, HE and the KCC for inclusion in that chapter of the ES.

ii. *Ground Conditions and Land Contamination / Air Quality / Noise and Vibration/Microclimate*

The scope of the ES chapter is the approach to identifying and assessing the effects of the proposed development on ground conditions and other areas, during both the demolition and construction works and once the development is operational and complete.

As noted above, the LPA has not received detailed comments from the EA nor from our Environmental Health section. This having been said, the LPA welcomes the applicant's commitment to scope these areas into the EIA.

Given the land uses at the site both present and historic, the LPA is of the view that there are contaminative uses associated with the site or adjacent land. Given the location of the site, there may also be the potential for wartime unexploded ordnances to be present. The ES should be supported by relevant surveys addressing these matters, with outline mitigation plans.

In addition, the demolition, construction and operational phases are likely to cause impacts to air quality which may impact upon sensitive receptors, as such the LPA considers that impacts to air quality should be assessed. This should include consideration of key pollutants such as Nitrogen dioxide (NO₂), and Particulate Matter (PM₁₀ and PM_{2.5}), as well as the activities of nearby industrial and aggregate users e.g., Britannia Refined Metals.

The applicant is advised to engage directly with the EA and our Environmental Health section on any issues it wishes to raise as work on the ES progresses. The LPA would ask that it be kept informed on any issues that arise and be regularly updated in order that it may assist where possible.

On noise and other impacts, the assessment should be sufficiently detailed for the LPA to understand the implications in terms of 'agent of change' principles and how the introduction of sensitive receptors into the area on a phased basis may affect the ability of existing commercial operators to trade. This should include an assessment of potential impacts on the site from the operation of Tilbury Docks and adjoining wharves and the nearby industrial premises in both Dartford and Gravesham. This assessment would of necessity have to include the impacts of traffic and ship movements associated with those uses.

In terms of microclimate, it is noted that wind effects are being taken into account, given the scale of the proposed buildings the variances in noise at differing levels will need to be considered, and not only at the base of tall buildings. Given that part of the development will be on the riverfront, the LPA would also ask that consideration be given to the effects of microclimate on the river itself close to the shore, where wind effects may impact on the manoeuvring of small craft - including sailing vessels. Once again, it is advised that the applicant discuss this with the PLA as it has been an issue in relation to the Albion Quayside development in Gravesend - albeit that lies in an area heavily used by such craft.

iii. Traffic and Transport

With regards to traffic generation and impacts to local transport networks, the LPA consulted both KCC Highways and National Highways. KCC note that pre-application discussions have already begun and of the view that the development is of sufficient scale and in a location which provides an opportunity to deliver some significant transport infrastructure and service improvements. National Highways are concerned with the potential impacts on the safe and efficient operation of the Strategic Road Network, particularly the M25 junctions 1a, 1b and 2 and the A2. Dartford Borough Council, as an adjoining LPA, is also concerned at potential impacts on both the local and SRN - please look at their detailed comments when addressing these issues.

In addition to the junctions you are proposing to assess shown at Figure 9 of the Scoping Report, it is also suggested that impacts on the Pepperhill and Tollgate A2 junctions and associated links back to the development site be considered.

Detailed methodology for the transport modelling will need to be agreed with the LPA, NH and KCC Highways, having regard to comments provided by Dartford Borough Council and the Development Corporation. The applicant's should engage with all parties to ensure an appropriate list of developments and other highways interventions are factored into the assessment. This will not necessarily be the same list as used to consider cumulative or in combination impacts given different factors may need to be assessed.

The LPA therefore agrees that given the number of potential residential units proposed, the scale of the mixed-use floorspace and the inclusion of multi-use/football stadium, the impact to traffic and local transport networks is potentially significant and that it should be scoped into the EIA. Similarly, the transport aspect should be scoped in during the demolition and construction phase, including for the reason set out above of possible overlap with works to the A2 in constructing the LTC.

Any Transport Assessment should be based on a realistic worst case scenario in the first instance before moving on to consider possible interventions and the ability to manage traffic growth through public transport and the promotion of active travel. Measures to be taken to reduce private car use and the transition to zero-carbon through encouragement of electric and ULEVs should

also be taken into account, with a robust assessment of the likely impacts of the multi-use stadium and how parking demand arising from this will be managed.

iv. Ecology and Biodiversity

The intent to scope ecology and biodiversity into the EIA at both the construction and demolition and operational stages is welcomed and agreed. It is noted that the preliminary assessment has identified the mudflats as a potential ecological resource. The implications of lighting within the development and impact on the foreshore should be considered and attention is drawn to comments above on the Estuary Edges guidance and ability to secure biodiversity improvements. Please note that the LPA does not have in-house experts in this field and will rely on Natural England, KCC Biodiversity and the Kent Wildlife Trust to provide advice, as appropriate.

Cumulative Developments

The Scoping Opinion notes the cumulative effects of the proposed development and the interactions of the development. Schedule 4, 5(e) of the EIA regulations requires that a description of the likely significant effects of the development on the environment resulting from cumulation of effects with existing and/or approved projects, having regard to existing environmental problems.

Ebbsfleet (EDC), Dartford (DBC) and Thurrock (TBC), have all commented that either that a number of developments have not been considered within the Scoping Report or that committed developments have been adequately addressed. Table 2 of the Scoping Report distinguishes between Tier 1 developments being developments over 150 residential and/or 10,000sqm of mixed use floorspace for developments that have been approved and developments that have been submitted. While London Resort forms a Tier 2 development, it is currently a withdrawn Nationally Significant Infrastructure Project (NSIP).

Whilst it is acknowledged that committed developments are not technically a requirement of Schedule 4, 5(e), the scale of the proposed scheme could warrant such developments as relevance under regulation 18(3)(f). For instance, EDC reference a range of developments within their boundary that could be of relevance to the development, but maybe of more relevance, EDC highlight they are expecting a major outline application at Ebbsfleet Central East which is c.37 hectares in area and located immediately south of the proposed Northfleet Harbourside application boundary.

Whilst the LTC submission is not yet live, it is likely that the application could be submitted during the course of the determination period of Northfleet Harbourside. This is now anticipated to take place Autumn 2022. The LPA therefore takes the view, that the cumulative effects of this development **should be scoped into the EIA**.

DBC have not provided a list of likely committed developments they would like taken into consideration but do suggest the applicants engage with them directly. Thurrock also mention that they are considering an application for the 'Construction and operation of a cementitious products manufacturing facility' located at berth 40A, Tilbury Freeport (their reference 22/00466/FUL). Therefore, given the sensitive land uses proposed within the proposed development that this should also be factored into the EIA given possible impacts in terms of noise and air quality.

The LPA is of the opinion that the parameters suggested within the Scoping Report for identifying projects which may result in cumulative impacts is too restricted and should be reviewed in consultation with interested parties. On this, it would be logical if there was parity with the approaches used in EIAs for other sites in the immediate vicinity, including the EDC applications for Grove Road and Ebbsfleet Central e.g. consideration of proposals as part of the cumulative impact of other schemes within 5km of the site.

It is recommended the following are also included:

- The development will have a multi phase construction programme, and therefore Construction and

Operations will overlap, and therefore cumulative effects arising from both construction and operational phases should be included and measured through a series of time slices to ensure worst case scenario is measured.

- Applications that remain extant at point of submission

- Allocations within the adopted Local Plan Core Strategy
- Developments within the Borough

The LPA would therefore welcome discussions with the applicant on how to move this forward.

Summary

The LPA disagree with the EIA Scoping Report and consider that the following aspects should be scoped into the ES:

- Water Resources , Flood Risk / Site Drainage;
- Waste and Materials;
- Project Vulnerability

This is for the reasons set out above and for the sake of brevity these are not repeated within the summary.

The LPA has also above provided detailed comments and advice on other aspects of the EIA that the applicant is advised to take into account, including the need to seek separate guidance from key stakeholders where detailed comments have not been provided to the LPA as a result of consultations.

This opinion is made on the basis of the details which have been supplied so far and other information currently available and does not preclude the LPA from requesting further information when considering any future application and accompanying ES for this development. In reaching this decision the LPA has taken account of the specific characteristics of the particular development, the specific characteristics of the type concerned and the environmental features likely to be affected by the development as required under Regulation 15(6).

Dated: 16 September 2022

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU



~~~~~