

11 April 2024

FAO: Shazad Ghani, Head of Planning
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Dear Shazad,

Northfleet Harbourside – Environmental Impact Assessment Update Letter – Ref: 20221064

This letter accompanies amendments which are being made in relation to the Northfleet Harbourside planning application (Ref. 20221064). The proposed amendments are being sought by Northfleet Central 1 Limited (hereinafter referred to as 'the Applicant').

In October 2022 the Applicant submitted an outline planning application for the redevelopment of the 'Northfleet Harbourside' site (hereafter referred to as the 'site') for the demolition of all existing buildings and structures and the construction of a phased development of up to 3,500 residential units, non-residential uses (including hotel, multi-use stadium, leisure facilities, office, retail and food and beverage uses), and associated servicing facilities, parking, plant space, open space (including a public park), landscaping, access and highways works located in the administrative boundary of Gravesham Borough Council ('GBC').

An Environmental Impact Assessment ('EIA') was undertaken and an Environmental Statement ('ES') prepared ('the 2022 ES') and submitted to accompany the planning application for the Proposed Development¹.

The full description of the Proposed Development is as follows:

"Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works."

The planning application is currently being determined by the Local Authority and is considered to be a 'live' application.

¹ The 2022 ES is available to view directly on GBC's Planning Portal: <https://plan.gravesham.gov.uk/online-applications/caseDetails.do?caseType=Application&keyVal=RJ7WAJHP07L00>



Proposed Amendments

Following the submission of the planning application in October 2022, engagement with a wide range of stakeholders has continued. This ongoing engagement has resulted in a small number of changes and clarifications to the Proposed Development which have been addressed in this updated submission. The set of amendments (the 'Proposed Amendments') considered within this letter are illustrated in Figure 1 and are as follows:

- Removal of the Plot 8 building to allow for an internal indicative highway connection between the site and Grove Road (as agreed with Kent County Council Highways);
- Revised internal indicative highways routes, including the addition of an internal indicative roundabout at the south-western extent of the site within Plot 2, amending the internal junction within the site where the site joins the B2175, and an additional internal indicative highway route between Plots 6 and 7 to join Grove Road (as agreed with Kent County Council Highways);
- Inclusion of a 'Deculverting Zone' which will prohibit built development within this zone in order to allow for the deculverting of the Ebbsfleet river, which runs through the eastern extent of the site within a culvert (as agreed with the Environment Agency); and
- Amendments to the massing of the Plot 6 and 7 buildings, with the removal of maximum building massing to outside of the Deculverting Zone to allow for daylighting of the culverted watercourse (as agreed with the Environment Agency). The Plot 6 and 7 buildings had the potential to provide approximately 45 and 90 units respectively. Further to the massing alterations to the Plot 6 and 7 buildings, these buildings are still anticipated to be able to accommodate the same total maximum number of units subject to detailed design work.

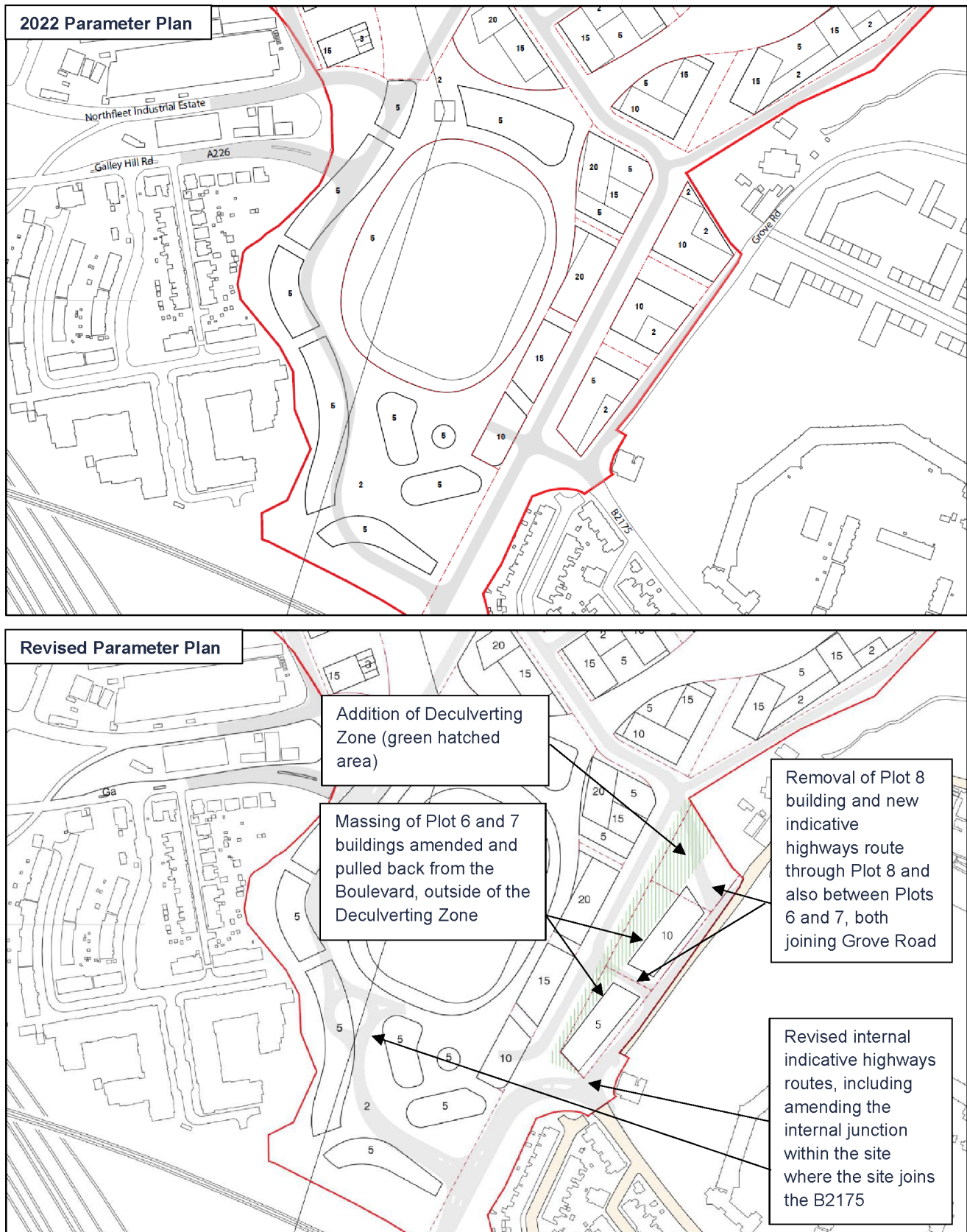
The overall maximum number of units sought for approval by the planning application, and as assessed in the 2022 ES (3,500 units), remains the same. The Plot 8 building had the potential to accommodate approximately 127 new homes. These units displaced by the removal of the Plot 8 building will be re-provided elsewhere across the site. It is expected that these units could be redistributed across the other 14 Plot buildings in the Proposed Development where residential use is proposed through a reconfiguration of the internal layout of the buildings. Given the outline nature of the planning application, this level of design work has not yet been undertaken, however at an average of approximately 9 homes per Plot building, this is likely to be deliverable.

Further to consultation with Natural England, wet ditches and other cat predation mitigation measures, as discussed in the Design Code and Shadow Habitat Regulations Assessment, have been explored in discussion with Natural England. It should be noted that the provision of wet ditches and other cat mitigation measures would also not affect the total maximum number of residential units sought for approval by the planning application.

Figure 1 below illustrates the Proposed Amendments compared against the 2022 Scheme (Ref. 20221064).



Figure 1 Proposed Amendments²



² Note, this figure provides a comparison of extracts of the 'Maximum Building Levels' Parameter Plan submitted with the 2022 outline planning application (Ref. 20221064) and the revised Parameter Plans in order to illustrate the Proposed Amendments.



Review of the Proposed Amendments

This EIA Update Letter should be read in conjunction with the 2022 ES. It considers any changes since the preparation of the 2022 ES, and where change(s) have occurred, a statement is provided regarding the implications in terms of the assessment presented in the 2022 ES. Equally, where there is no change, or no material change, a statement is also made to this effect. It should be noted that the Proposed Amendments have been reviewed and considered by the technical teams that undertook the 2022 ES assessments and as such is based on sound professional judgement.

The Proposed Amendments (as outlined above) do not result in any changes to the demolition and construction methodology and associated assumptions of the Proposed Development as detailed in ES Volume 1, Chapter 5: Demolition and Construction. It should be noted that during the preparation of the 2022 ES (as set out in paragraph 4.68 of ES Volume 1, Chapter 4: The Proposed Development and paragraph 5.29 of ES Volume 1, Chapter 5: Demolition and Construction), the Proposed Development assessed included the diversion and realignment of the Ebbsfleet river culvert beneath the eastern extent of the site. As such, deculverting activities (including the provision of the two highways 'bridges' over the deculverted watercourse) proposed as part of the Proposed Amendments will not change, or introduce new, mechanisms of potential impact. Therefore, the demolition and construction phase assessments presented within the technical assessments of the 2022 ES (ES Volume 1, Chapter 6 to 15 and Volume 2) remain applicable and valid.

There are no changes to the topics 'scoped out' of the 2022 ES.

There are some topics in the 2022 ES which are unaffected and are therefore not considered further within this letter as the Proposed Amendments do not affect the original assessments. The effects identified in the 2022 ES for ES Volume 1, Chapter 12: Climate Change and Greenhouse Gas Assessment are unchanged as a result of the amendments to the Proposed Development and the assessments as presented within 2022 ES remain valid.

The changes to the massing (Plots 6 and 7 building massing has been amended and pulled back from the Boulevard and the Plot 8 building removed – see Figure 1), highways (revised internal indicative highways routes, including internal junctions – see Figure 1) and culvert works (proposed deculverting of the Ebbsfleet river beneath the site as opposed to diversion and realignment – see Figure 1) assessed within the 2022 ES have been discussed further below in relation to the following assessments, as there is the *potential* for these assessments to be affected by the Proposed Amendments:

- Volume 1, Chapter 6: Socio-Economics and Health;
- Volume 1, Chapter 7: Traffic and Transport;
- Volume 1, Chapter 8: Air Quality;
- Volume 1, Chapter 9: Noise and Vibration;
- Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing, Solar Glare and Light Intrusion;
- Volume 1, Chapter 11: Wind Microclimate;
- Volume 1, Chapter 13: Archaeology;
- Volume 1, Chapter 14: Ecology and Biodiversity;
- Volume 1, Chapter 15: Water Resources, Flood Risk, Drainage and Ground Conditions; and
- Volume 2, Townscape and Visual Impact Assessment.

Volume 1, Chapter 6: Socio-Economics and Health

The Proposed Amendments have been reviewed by Montagu Evans in relation to the likely socio-economic and health effects at sensitive receptors within and around the site.

The proposed accommodation to be lost through removal of Plot 8 will be re-provided elsewhere on the site, meaning the overall quantum of development (and associated socio-economic/health effects as relevant) are unchanged at a site level. In total, it is anticipated that approximately 127 new homes could have been



accommodated within Plot 8, which represents approximately 4% of the total maximum number of homes proposed. It is expected that these new homes will instead be provided within the remaining 14 blocks; an increase on average of approximately 9 homes per block would be considered achievable. Even in the event it was not possible to re-provide the total number of units elsewhere on-site, the reduction in the number of homes delivered would not be sufficient to change the level of significance assigned to any individual socio-economic effect.

The other Proposed Amendments (i.e., provision of deculverting zone, amendments to Plots 6 and 7, and highways layout changes) do not have the potential to affect the socio-economic and health assessment.

Overall, the conclusions and resultant effects of the assessment carried out in the 2022 Socio-Economics and Health ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 7: Traffic and Transport

The Proposed Amendments have been qualitatively reviewed by SLR in relation to the impact that these may have on the Traffic and Transport conditions within and around the site.

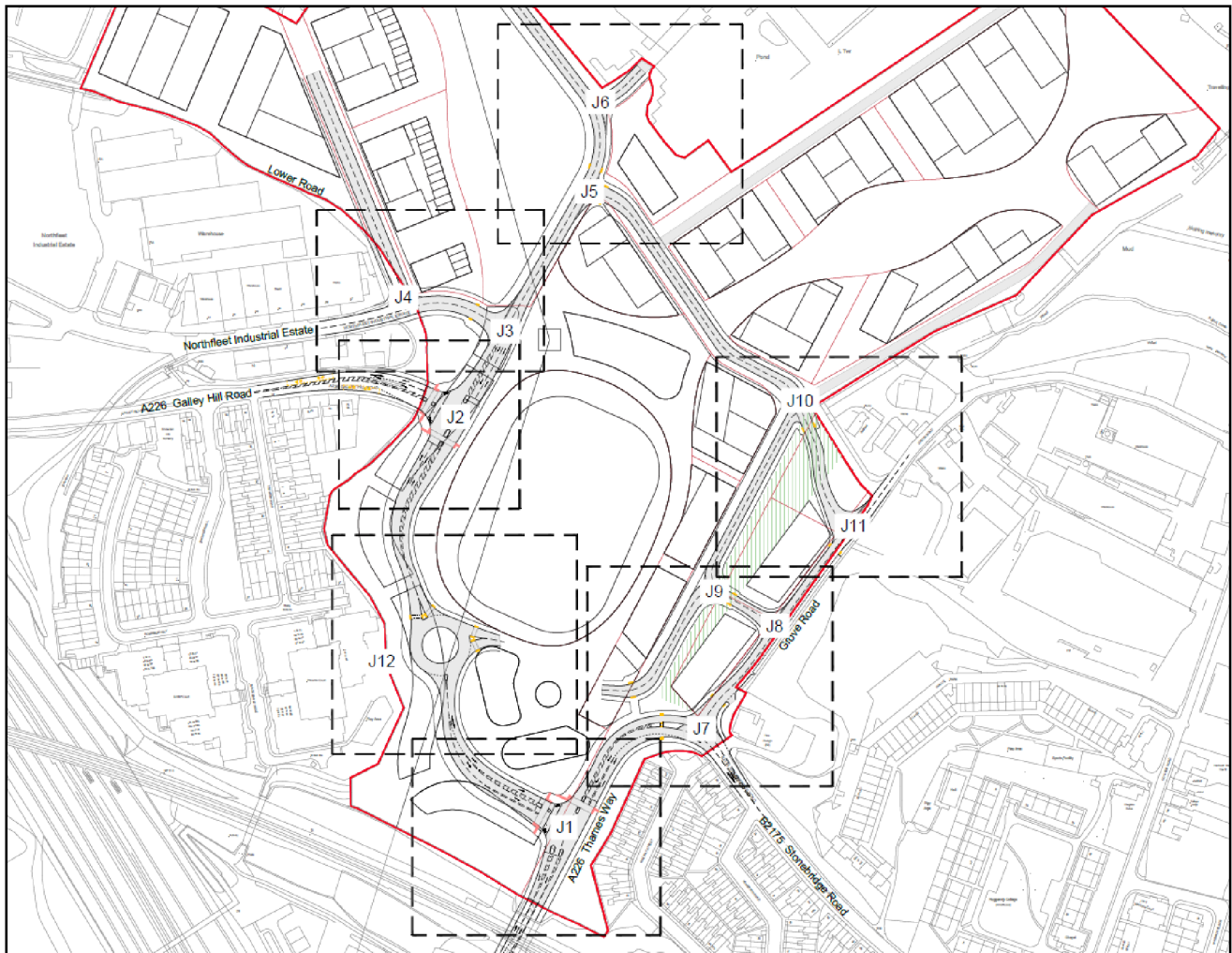
Although the Plot 8 building will be removed, the overall maximum number of residential units will remain the same. Therefore, the total trip generation will remain consistent with that assessed within the 2022 ES Chapter, although the trip distribution has changed in line with the revised highways proposals.

The Proposed Amendments provide revised vehicle links between the Boulevard, Grove Road and Stonebridge Road. Previously a connection to Grove Road was not provided with vehicles solely using the Boulevard to access and egress the site from Stonebridge Road. Specifically, Junctions 8 and 11 (see Figure 2) have been introduced which provide this connection. The consequence is that site traffic can now route onto Grove Road. Between Junction 8 and 11 this uplift in trips will be minimal as the only additional traffic will be Fastrack buses. The same Fastrack bus traffic will utilise the new link introduced by the Proposed Amendments between Junctions 10 and 11 through Plot 8. Given that this is a new highways link, all trips at this location are new and not comparable to the 2022 ES. It should be noted that this carriageway will benefit from a new shared footway on one side of the carriageway and a footway on the other side of the carriageway, with a 20mph speed limit.

Between Junction 7 and 8 (approximately 60m long), this uplift will be more considerable as all other site traffic will use this section of Grove Road to access onto Stonebridge Road, as opposed to accessing Stonebridge Road between Junction 7 and Junction 1. The same development traffic will utilise the new link introduced by the Proposed Amendments between Junctions 9 and 8 between Plots 6 and 7. Given that this is a new highways link, all trips at this location are new and not comparable to the 2022 ES, where this traffic would have previously gone along the Boulevard along the link between Junctions 1 and 7 as per the previous highways layout. As such, this change represents a small re-routing of development traffic within the site. It should be noted that this link will also benefit from a 20mph speed limit and footways along both sides of the carriageway.



Figure 2 Site Access Plan



The Proposed Amendments do not have a material impact upon the proximity to sensitive receptors given that the only change would be traffic routing along the eastern side as opposed to the western side of the Plot 6 and 7 buildings between Grove Road and the Boulevard.

The implications of these revisions are that development traffic must now route onto Grove Road. At Junction 11 there will solely be Fastrack buses routing onto Grove Road, however at Junction 8 there will include the remaining site vehicles that access the site from this direction (approximately 40% of site traffic). Therefore, the area of notable change is between Junction 7 and 8.

By re-routing site traffic along Grove Road the vehicles flows along this section will increase from 2,389 in the 2031 baseline to 9,254 'With Development' trips added. The following sub-sections consider the transport implications of this change in traffic distribution.

Severance

In terms of severance this can be considered to be a major adverse impact in the absence of mitigation. However, when consideration is made to the embedded mitigation proposed as part of the Proposed Development, specifically crossings at Junction 7 and signalised crossings at Junction 1, no further mitigation is needed. Furthermore, these movements are not being moved from an entirely different area, they are merely being shifted from the previous access onto the Boulevard (immediately to the west) to the new Grove Road route and junction. Therefore, pedestrians travelling east of the site would have been required to cross this flow of traffic at the Boulevard in the prior arrangement (as well as crossing Grove Road). Therefore, in severance terms, the revised layout offers an improvement, with one fewer road to cross and an increase in pedestrian crossings.



Pedestrian Delay

In terms of pedestrian delay a similar consideration should be made. The revised layout has merely shifted traffic from the Boulevard across to Grove Road, meaning those travelling along Stonebridge Road will cross a road with the same traffic level - now proposed at Grove Road and not the Boulevard. Pedestrians will also have one less crossing to make, meaning their delay is reduced when walking along Stonebridge Road.

Pedestrian Amenity

In terms of pedestrian amenity, the embedded mitigation proposed as part of the Proposed Development is considerable, with new crossings at and around Junction 7, a new signalised crossing at Junction 1, a widened footway along Grove Road and a wide array of alternative pedestrian routes through the site itself. Furthermore, given the removal of the previous proposed Boulevard junction with Stonebridge Road, pedestrians will have one less road to cross when travelling east of the site, improving their experience and thus amenity. The inclusion of the pedestrianised deculverted zone will also be beneficial for those walking from Stonebridge Road into the site and along the Boulevard towards the Harbourside area of the site, affording pedestrians more space and a better environment in this zone. Furthermore, the pedestrianised deculverted zone at Plot 8 will create an attractive entrance to the site for users of the England Coastal Path, which routes along Grove Road.

Fear and Intimidation

In terms of fear and intimidation, again the traffic is only being shifted from the Boulevard to Grove Road, located on a parallel road to the east. Therefore, as is the case with the previous 2022 Scheme, pedestrians would still have been crossing and travelling along a road with traffic flows similar to those proposed along Grove Road. In light of the Proposed Amendments, this traffic will shift away from the centre of the site, which in reality would reduce levels of fear and intimidation for site users and pedestrians travelling east of the site as a result of there being one less crossing to make, reducing feelings of fear and intimidation. Furthermore, the footway along Grove Road will be widened and therefore anyone travelling along Grove Road would have an improved experience as a result of the greater distance between themselves and the carriageway.

Driver Delay

In terms of driver delay, junction modelling has been undertaken at the proposed Grove Road/Stonebridge Road junction to illustrate that this junction would work with the Proposed Development traffic in light of the Proposed Amendments.

Safety

In terms of road safety, the footways along Grove Road will be widened as part of embedded mitigation. Furthermore, Junction 7 has been designed in accordance with the relevant DfT design standards. This has included consideration of both vehicle to vehicle and pedestrian to vehicle visibility splays for a 30mph road.

The layout was revised as a result of safety concerns raised by KCC regarding the Boulevard junction, specifically with regard to junction spacing. As such, the Proposed Amendments have been developed to remove this concern, creating a safer road layout when compared to that previously proposed.

The other Proposed Amendments (i.e., amendments to Plots 6 and 7) do not have the potential to affect the traffic and transport assessment.

Overall, the conclusions and resultant effects of the assessment carried out in the 2022 Traffic and Transport ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 8: Air Quality

The Proposed Amendments have been qualitatively reviewed by Air Quality Consultants Ltd in relation to the likely air quality impacts at sensitive receptors within and around the site, including review of the updated trip distribution provided by the project transport consultants. Professional judgement has been used to consider how the Proposed Amendments may impact the air quality assessment as presented in ES Volume 1, Chapter 8: Air Quality.



The Proposed Amendments will not result in any additional sensitive receptors being introduced close to the A226, B2175 or Grove Road, however the reconfiguration of the road network compared to what was assessed in the 2022 ES will likely result in additional development traffic on Grove Road, the A226 and on new roads within the development that join Grove Road. In the 2022 ES, it was reported that the highest annual mean NO₂ concentration at a proposed receptor (located close to the junction of the B2175, A226 and Grove Road) in the opening year was 29.3 µg/m³, with a contribution of 0.6 µg/m³ from 6,301 development related vehicles on the B2175 and 7,388 development vehicles on the A226. The proposed changes to the road layout and traffic distribution may potentially result in 10,639 development related movements on the A226, representing an increase of 44% from what was assessed in the 2022 ES. Were the development traffic contribution to NO₂ concentrations to also increase by 44% as a result, the total concentration at the worst-case proposed receptor would be 30.2 µg/m³, which is still well below the objective value (40 µg/m³); thus, air quality for future residents would remain acceptable, in line with the conclusions of the 2022 ES.

With regards to the impacts of these traffic changes on existing residences, the worst-case receptor close to the same junction (located to the south of the junction) was reported in the 2022 ES to experience an increase of 1.3 µg/m³ of NO₂, resulting in a total annual mean NO₂ concentration of 25.4 µg/m³. This impact represents a 3% increase when compared to the annual mean NO₂ objective, resulting in a negligible impact according to the EPUK/IAQM guidance and a conclusion of no likely significant effects in the 2022 ES. Applying the 44% traffic increase to this air quality impact would result in a 1.9 µg/m³ increase in NO₂ concentration (instead of 1.3 µg/m³), which would be a 5% increase relative to the objective (instead of 3%). The total concentration would remain below 75% of the objective, therefore the impact would remain negligible according to the EPUK/IAQM guidance; thus, there would be no change in the likely significant effects reported in the ES.

The provision of the deculverting zone as part of the Proposed Amendments does not have the potential to affect the air quality assessment.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Air Quality ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 9: Noise and Vibration

The Proposed Amendments have been quantitatively reviewed in relation to the likely noise and vibration impacts at sensitive receptors within and around the site, including review of the updated trip distribution provided by the project transport consultants.

Taking into consideration the updated trip distribution, it is considered that the Wallis Park and Railway Street residential receptors are the only receptors that could be affected by the Proposed Amendments, given the re-routing of traffic along Grove Road, and therefore closer proximity of traffic to these receptors. The increase in ambient noise level has been calculated to be less than 2.9 dBA at Wallis Park and Railway Street (previously 1 dBA in the 2022 ES). This change is considered minor, where the magnitude of impact will remain the same as reported in the 2022 ES, with the assessment of a Minor Adverse (Not Significant) effect at these receptors remaining valid. Therefore, while there will be an increase in traffic noise, the effects will be the same as those previously identified, with no new or additional mitigation proposed.

The provision of the deculverting zone as part of the Proposed Amendments does not have the potential to affect the noise and vibration assessment.

The conclusions and resultant effects of the assessment carried out in the 2022 Noise and Vibration ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing, Solar Glare and Light Intrusion

The Proposed Amendments have been qualitatively reviewed by GIA in relation to the impact that these may have on the Daylight, Sunlight, Overshadowing, Solar Glare and Light Intrusion conditions within and around the site.

The removal of the Plot 8 building and amendments to the Plot 6 and 7 building massing would not materially



affect any of the receptors assessed with regards to light intrusion and overshadowing given the location and distance of receptors considered relevant to the Proposed Amendments. Furthermore, owing to the distance of the Plot 6, 7 and 8 buildings from the sensitive receptors assessed within the 2022 ES Chapter, there would be no noticeable impact on any of the neighbouring properties with regards to daylight and sunlight, which are located to the west of the site. With regards to solar glare, the Proposed Amendments will not materially affect the viewpoints assessed, including Road viewpoint 2 (B2175 along Stonebridge Road) which is the viewpoint located closest to Plots 6, 7 and 8.

The highways works and provision of the deculverting zone as part of the Proposed Amendments does not have the potential to affect the daylight, sunlight, overshadowing, solar glare and light intrusion assessments.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Daylight, Sunlight, Overshadowing, Solar Glare and Light Intrusion ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 11: Wind Microclimate

The Proposed Amendments have been qualitatively reviewed by GIA, with reference to the wind assessment undertaken in October 2022.

The Proposed Amendments relating to massing (i.e., the amendments to the Plot 6, 7 and 8 buildings, which are relevant to the wind assessment) are located in areas that were not flagged as critical for wind conditions as part of the 2022 ES and are not considered to have a material effect upon the conditions (i.e., comfort and safety criteria) assessed within and surrounding the site. Therefore, wind conditions presented in ES Volume 1, Chapter 11: Wind Microclimate would remain valid. It should be noted that in the 2022 ES assessment, mitigation measures in combination with the proposed landscaping scheme were required to provide safe and suitable wind conditions in and around the site and these would still be required.

The Proposed Amendments with regards to massing changes would not be expected to materially affect the wind conditions at and around the Proposed Development (the highways works and provision of the deculverting zone as part of the Proposed Amendments does not have the potential to affect the wind assessment). Therefore, with the removal of the Plot 8 building and amendments to the Plot 6 and 7 building massing (as per the Proposed Amendments), and with the inclusion of proposed landscaping and the previously proposed wind mitigation measures, the resultant wind conditions would be expected to be remain consistent with the 2022 Wind Microclimate ES Chapter.

Volume 1, Chapter 13: Archaeology

The Proposed Amendments have been reviewed by Wessex Archaeology in relation to the impact that these may have on the archaeological assessment presented in the 2022 ES.

The deculverting activities will be contained within areas that were already planned for development, and effects to potential buried archaeological remains within these areas have been assessed as part of the 2022 ES. The assessment of effects for buried archaeological remains was based upon a worst-case scenario that archaeological remains could be damaged or removed by below ground works relating to the Proposed Development. The addition of deculverting and re-located units (within areas already proposed for development) will not change the assessment of effects or mitigation proposed for buried archaeological remains.

The other Proposed Amendments (i.e., amendments to Plots 6, 7 and 8, and highways layout changes) do not have the potential to affect the archaeological assessment.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Archaeology ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 14: Ecology and Biodiversity

The Proposed Amendments have been reviewed by Assystem in relation to the impact that these may have on the ecology and biodiversity assessment presented in the 2022 ES.



The proposed deculverting of the River Ebbsfleet within the site could provide an improvement to the watercourse with regards to ecology, however given the extent of deculverting is minor in relation to the rest of the culverted watercourse, any beneficial effect upon this receptor is considered to be not significant.

With regards to the reprovizion of the lost Plot 8 building units across the site, given that the assessment (for example the potential impact of recreational pressure upon the Swanscombe Peninsula Site of Special Scientific Interest) considered the maximum parameters and number of residential units across the site which remain the same, the assessment presented in the 2022 ES remains valid.

The other Proposed Amendments (i.e., amendments to Plots 6 and 7 and highways layout changes) do not have the potential to affect the ecological assessment.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Ecology and Biodiversity ES Chapter remain unchanged and valid in light of the Proposed Amendments.

Volume 1, Chapter 15: Water Resources, Flood Risk, Drainage and Ground Conditions

The Proposed Amendments have been reviewed by RMA Environmental in relation to the impact that these may have on the water resources, drainage, flood risk and ground conditions assessment presented in the 2022 ES.

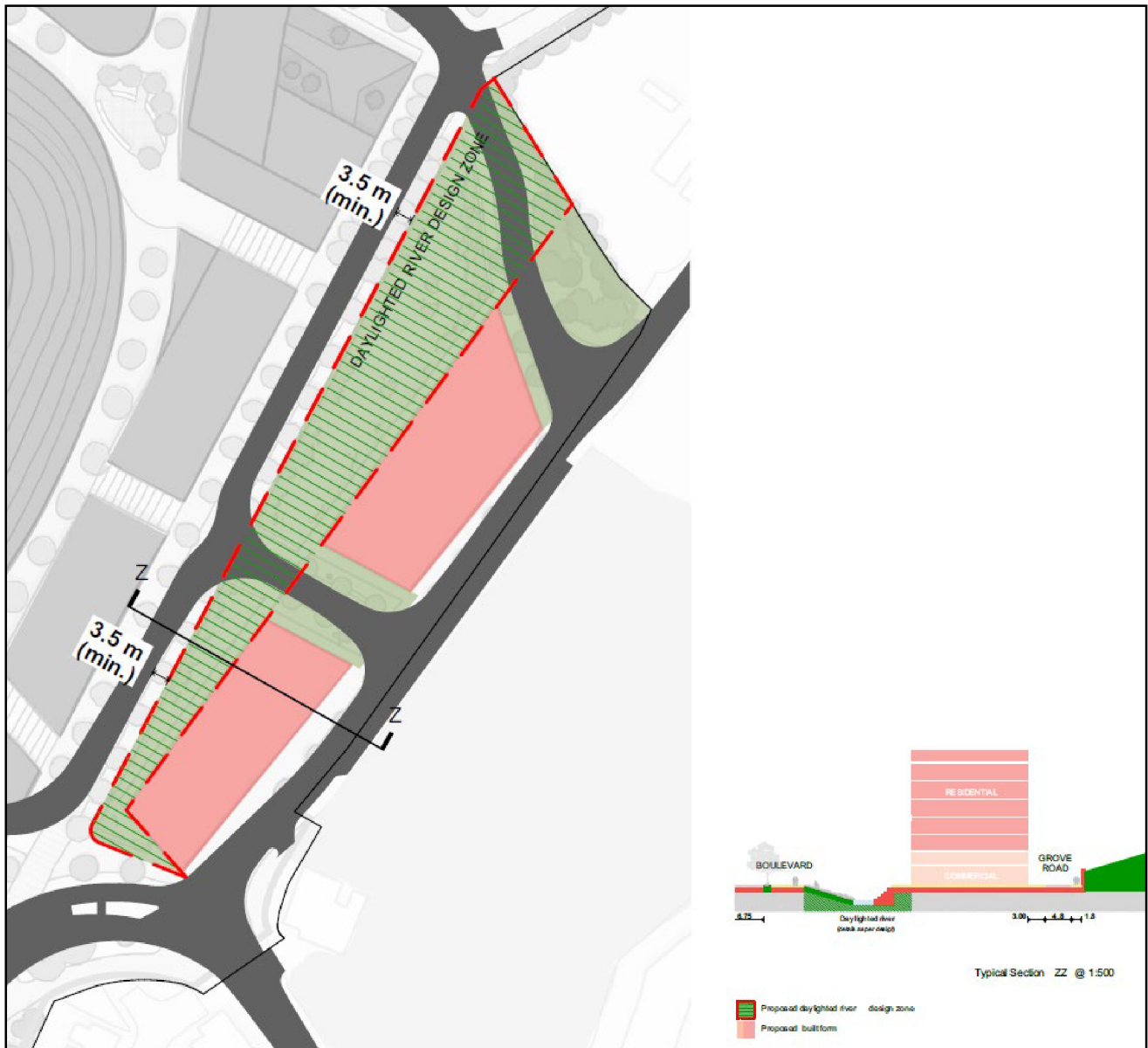
The Proposed Amendments do not materially affect the conclusions of the Water Resources, Flood Risk, Drainage and Ground Conditions ES Chapter. The conclusions still stand in that following the implementation of the mitigation measures set out in the ES Chapter, it is considered that there are no significant adverse effects resulting from the Proposed Development on ground conditions, including water quality. As set out in the ES Chapter, it remains that there is the potential that a Minor Beneficial (Significant) effect could arise as a result of the Proposed Development, should the site investigation determine existing contamination on site, this will be remediated and therefore provide a beneficial impact when compared to the existing site conditions. Similarly, as in the 2022 ES Chapter, providing an appropriate Surface Water Drainage Strategy to treat surface water runoff will result in a Negligible to Minor Beneficial (Significant) effect on hydrology when compared to the existing surface water treatment regime.

It should be noted that the Flood Risk Assessment ('FRA'), which formed Annex 3 of ES Volume 3, Appendix: Water Resources, Flood Risk, Drainage and Ground Conditions, has been updated to reflect the Proposed Amendments – for example, Appendix J of the FRA has been updated to illustrate the proposed river daylighting zone, as shown in Figure 3. The FRA draws on the benefit of de-culverting and naturalising the river channel providing enhancement to the site when compared to the existing scenario in respect to biodiversity, visual amenity and flood risk benefits of which will be confirmed at detailed design stage. The updated FRA has been submitted as supplemental information alongside the updated Parameter Plans (which reflect the Proposed Amendments). This update to the FRA does not affect the conclusions of the 2022 ES.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Water Resources , Flood Risk, Drainage and Ground Conditions ES Chapter remain unchanged and valid in light of the Proposed Amendments.



Figure 3 **Proposed River Daylighting Zone**



Volume 2, Townscape and Visual Impact Assessment

The Proposed Amendments have been qualitatively reviewed by Montagu Evans in relation to the impact that these may have on the Townscape and Visual Impact conditions within and around the site. Professional judgement has been used to consider these Proposed Amendments.

The removal of the Plot 8 building and changes to the Plot 6 and 7 building massing would be most relevant in views 13 (Railway Street / Hamerton Road Junction), 14 (The Creek / Grove Road) and 15 (Grove Road / Stonebridge Road) roundabout and, in relation to townscape character areas 1 (mixed-use/commercial estate), 4 (green space) and 5 (industrial). It is considered that based on the nature of the Proposed Amendments (i.e. the removal of the Plot 8 building and widening of the Boulevard relating to the changes to the Plot 6 and 7 building massing) in the context of the remaining surrounding development plots and assessed building massing, the identified visual and townscape effects identified in the 2022 TVIA would be unaffected. Annex A provides updated viewpoint images which account for the Proposed Amendments from the relevant views.

The highways works and provision of the deculverting zone as part of the Proposed Amendments does not have the potential to affect the townscape and visual impact assessment.



Taking into account the Proposed Amendments, the buildings will continue to provide an attractive skyline composition that is embedded into the wider Kent landscape. Visual receptors will still appreciate the various typologies of the development and the public open spaces that connect Northfleet Harbourside with the existing neighbourhoods and the River Thames. Furthermore, the proposed buildings will continue to transition between character areas as stipulated in the Design Code, create a varied townscape, that responds to the specific conditions around the site, and enhance the existing visual amenity of the area. The Proposed Amendments would also not result in any new effects upon the townscape character areas and visual receptor representative views.

Therefore, the conclusions and resultant effects of the assessment carried out in the 2022 Townscape and Visual Impact Assessment remain unchanged and valid in light of the Proposed Amendments.

Conclusion

To conclude, the Proposed Amendments do not generate any additional or different likely significant effects to those reported upon within the 2022 ES. The 2022 ES therefore remains valid.

Kind regards,

Abbey Musker



Partner
Trium Environmental Consulting LLP



ANNEX A UPDATED VIEWPOINTS



37.7° 35° 30° 25° 20° 15° 10° 5° 0° 5° 10° 15° 20° 25° 30° 35° 37.7°



Northfleet Harbourside | Ebbsfleet
Viewpoint 14
Proposed

Capture Date: 03/08/2022
Time: 15:52
Rel No: 02

Lens
Camera Height
above ground

24mm
5mm Shif
1600 mm



Northfleet Harbourside | Ebbsfleet
Viewpoint 15
Proposed

Capture Date: 03/08/2022
Time: 14:45
Rel No: 02

Lens
Camera Height
above ground

24mm
7mm Shif
1600 mm