

Please ask for: Wendy Simpson
Our Ref: EDC/25/0151
Date: 8 September 2025



Sent by email only to:
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Ebbsfleet Development Corporation
The Observatory
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Castle Hill
Ebbsfleet
Kent DA10 1EE

Dear Ms Cue

APPLICATION NUMBER: 20250730

LOCATION: Land adjacent to Thames Way, Northfleet, Gravesend, Kent

PROPOSAL: Installation of electricity infrastructure including a battery energy storage system, substation and ancillary electrical infrastructure

I write in response to your letter dated 18 August 2025 inviting the views of the Ebbsfleet Development Corporation (EDC) on the above planning application currently under consideration by the Borough Council.

The site does not fall within the urban development area of the EDC. However, the scale and direct adjacency of the proposed development is such that it could have significant effects on approved and planned new developments within the EDC's boundary and we have some observations that we request the Borough Council take into account.

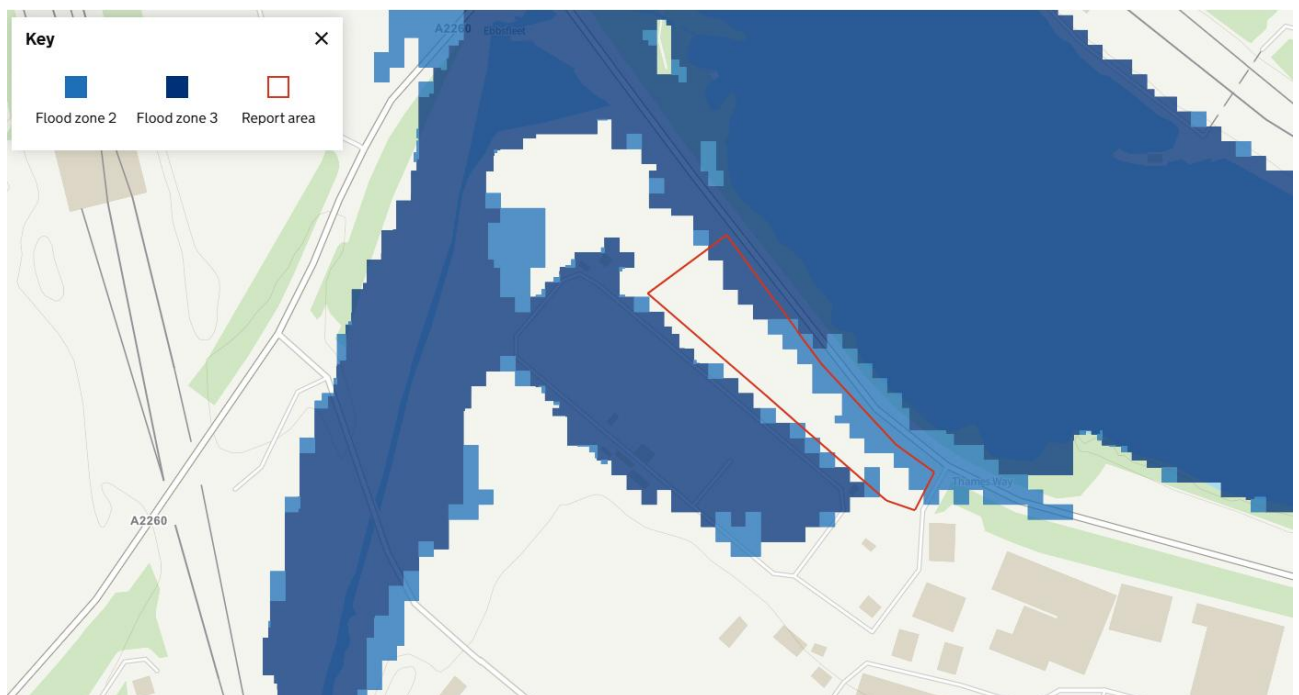
These comments are provided by EDC in its role as adjacent local planning authority but also land owner of adjacent land at and around Thames Way and Ebbsfleet Central Strategic Development Area, including Blue Lake, and as applicant for a live outline planning application (EDC reference EDC/22/0168) for major mixed use redevelopment of land around Ebbsfleet International Railway Station.

The EDC Assets, Projects and Infrastructure teams have been consulted and at this time the LPA **raise concerns** in relation to this proposal as set out in detail below.

1. **Red Line Boundary/Access/Land Ownership issues** - The application does not appear to include the proposed new access (or vision splays for that access) within the site red line boundary. The creation of a new access onto a classified road requires planning permission in its own right and needs therefore also to be within the description of the development. The proposed new access appears to cross land that is owned by KCC onto land that is owned by EDC, however the Certificate B has only been served on Gravesham Council property department. Between the site and the road there are also slithers of unregistered land. If the proposed access does cross any of the unregistered land running adjacent to Thames Way then in that scenario a Certificate C should be signed following the placement of an advert in the local press. It also appears that there are various items of street furniture within the land being crossed by the proposed access and these should be plotted on the existing/proposed block plans. This should be regularised prior to determination.
2. **Flood Risk** – The application form states that the development does not fall within an area of flood risk but this is incorrect as the EA Flood Map shows it is crossed by areas of Flood

Risk 2 and 3 (see map extract below – red line drawn indicatively). As a minimum a Flood Risk Assessment needs to be completed for this development and if directed by guidance then the Environment Agency should be consulted. If the proposal (including the extended red line currently missing) is a major application, then the Lead Local Flood Authority should also be consulted.

The area of flood risk is on the periphery of the site but is still a material consideration. The applicant needs to demonstrate that the development will not worsen flood risk elsewhere and also that there are no safety issues arising from electricity equipment being situated in this location. Given that there will be a significant increase in impermeable ground surface as a result of the development, EDC would be concerned that flood risk may be worsened, and this could impact conditions along Thames Way. The EDC infrastructure team also advise that there are potential conflicts related to waste water outfall and storm drainage of EDC planned infrastructure in the area.



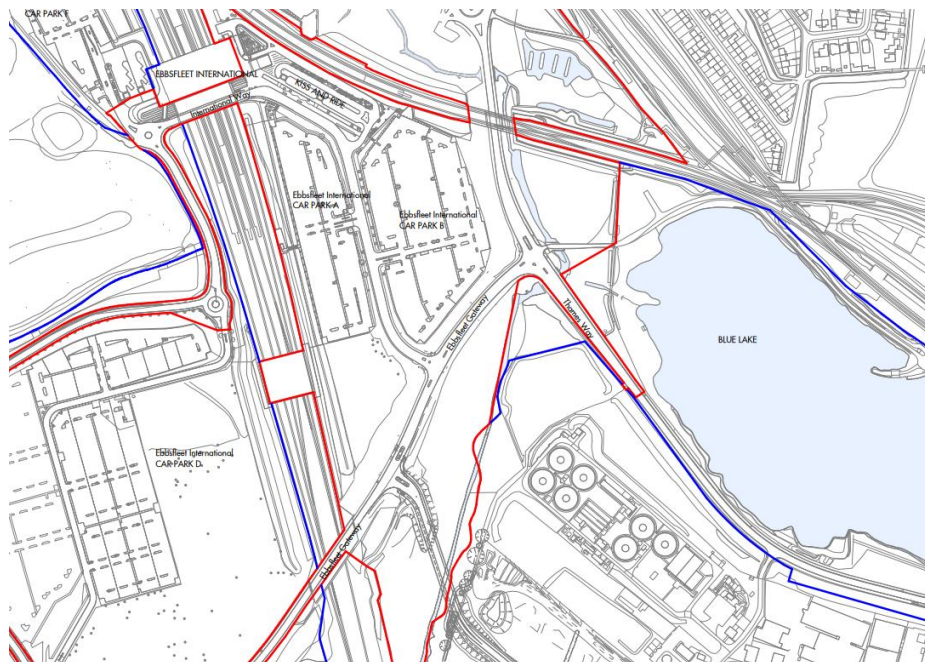
3. **Groundwater Vulnerability** – EDC note that on Defra Magic Maps that the Groundwater Vulnerability Map shows the site as medium-high risk. As such it would be expected that contamination matters are addressed in the assessment of the proposal and the EA and the GBC EHO consulted in this regard. This site is in close proximity to water bodies that fall within EDC's land ownership, Blue Lake and Ebbsfleet River and we would seek reassurance that this proposal would not lead to ground water contamination of these sites.
4. **SSSI Impact Risk zones** - EDC note that on Defra Magic Maps that the site also falls within the SSSI Impact Risk zones for a number of the Swanscombe area SSSIs. As such the GBC LPA must check if the type of development at the distance proposed will require consultation be carried out with Natural England.
5. **Heritage** – EDC note that the site is within an Area of Archaeological Potential and in close proximity to a Grade II* listed property. As such the proposal should be accompanied by a Heritage Assessment. None has been submitted to date and as such the NPPF requirements in relation to heritage impact cannot be assessed.
6. **Noise** – EDC Planning Committee have recently resolved to approve the Ebbsfleet Central East strategic development site, in very close proximity to the proposed battery storage

development. The legal agreement is currently being finalised before the permission is issued. The reference and details for that development are:

EDC/22/0168 - Ebbsfleet Central East Land Adjacent To Ebbsfleet International Railway Station Thames Way Kent

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

A partial site line for that development is shown below to aid understanding of proximity to the battery storage site proposed:



The Noise Impact Assessment (NIA) to support the battery storage application does not refer to the Ebbsfleet Central East strategic development but the ECE development should be included within the Noise Impact Assessment baseline for assessment, and note that planned residential development (at the corner of Thames Way and Ebbsfleet Gateway) is closer to the proposed development than some residential receptors already identified within the assessment. There will be a substantial quantum of residential development in this location (the current Area Master Plan for the outline permission shows in the region of 530 homes are situated (in Blocks N, O, P) along Thames Way and Ebbsfleet Gateway).

We also note that the noise survey was carried out in good conditions, rather than windy conditions which may exacerbate any appreciation of noise at receptor sites.

EDC anticipate that an updated NIA would show that noise is likely to be the most significant potential impact on Ebbsfleet Central as a result of this proposed development.

7. **Construction Traffic** – The Construction Traffic Management Plan (CTMP) states that no other construction activity is known in the immediate vicinity of the site and if other projects arise the applicant will co-ordinate with GBC and KCC.

However, the CTMP should take account of the Ebbsfleet Central development under application EDC/22/0168 (detailed in point 7 above) and consider whether there may be any cumulative traffic impacts on the local and strategic highway networks from the development of these two schemes in parallel. (There needs to be an acknowledgement of these projects potentially occurring at the same time.)

Furthermore, traffic management for Thames Way requires impact analysis to Ebbsfleet Gateway, especially with the Galley Hill Road closure and EDC have a series of temporary road closures planned over the next two years to facilitate the 33kV cable supply to two new primary substations.

8. **On-going infrastructure development** – There are significant infrastructure works proposed in the vicinity of this site to enable the Ebbsfleet Garden City build out. Planned and current major infrastructure projects include upgrades to the existing wastewater treatment works and Electricity 33kV cable routing and primary substation builds in adjacency. The proposed battery storage development will require connection to and from the Electricity Grid site and power requirements – these must be co-ordinated with the EDC adjacent major infrastructure works – which has not happened to date.

Furthermore, the adjacent Southern Water Waste Water Treatment Works (WWTW) has planned expansion and upgrade works. (SW have plans to expand the use of their site next to the boundary indicated in the proposals near their “grid compound”). Southern Water must be consulted in relation to this proposal and their own development. The impact of the design of the proposed development on the current odour contours from the WWTW need also be addressed.

9. **Existing vegetation along Thames Way** - it is difficult to tell whether or not the vegetation fronting Thames Way would be lost under this proposal. EDC would require for there to be established planting along Thames Way to screen the proposed large and utilitarian works. It would be helpful to see streetscene drawings of Thames Way to demonstrate the visual impact of the development from Thames Way in conjunction with existing development.

EDC thank you for the opportunity to review and would request to be consulted further if any further details are submitted in relation to this proposal.

Yours sincerely



EDC Director of Planning and Place