

PD/14069/JWB/PM/AP

Email: jon.bradburn@montagu-evans.co.uk
polly.mason@montagu-evans.co.uk
alex.partridge@montagu-evans.co.uk

70 St Mary Axe
London
EC3A 8BE
Tel: +44 (0) 20 7493 4002

Katherine Parkin,
Planning and Regeneration Services,
Gravesham Borough Council,
Civic Centre,
DA12 1AU

29 August 2023

Dear Katherine,

**NORTHFLEET HARBOURSIDE – LAND SURROUNDING EBBSFLEET UNITED FOOTBALL CLUB, BOUNDED BY
LOWER ROAD, RAILWAY LINE, GROVE ROAD THE RIVER THAMES – APPLICATION REF. 20221064
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICANT RESPONSE TO RESPONSES RECEIVED DURING APPLICATION DETERMINATION**

Montagu Evans submitted a planning application to the Gravesham Borough Council (“GBC”) in October 2022 on behalf of our client, Northfleet Central 1 Limited (the “Applicant”), seeking out outline permission for the redevelopment of Northfleet Harbourside. The Application was validated by the Council on 3 November 2022.

The proposed description of development as shown on the GBC validation letter is:

“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.”

Following the submission of the Application, a number of comments have been received, alongside requests for additional information in respect of a number of topics. The table below sets out the responses received, as well as the format for the Applicant's response.

Comments Received	Applicant Response
GBC Initial Comments May 2023	In respect of Use Class E(f) space – the correct quantum is up to 1,200 sqm, as per the submitted ES. In respect of the stadium, the correct proposed floorspace is 15,000 sqm, as per the Application Form and ES. Further responses provided in update to AY table (see AY Comments May 2023, below).
AY Comments May 2023	
Appendix I – Planning Review	Responses provided in table with supplementary documentation as follows: - Updated Minerals Impact Assessment, prepared by Wardell Armstrong (Appendix 1); - Addendum Retail and Leisure Statement, prepared by Montagu Evans (Appendix 2); - Northfleet Office Market Review, prepared by Montagu Evans (Appendix 3); - Hotel Briefing Note – further evidence and rationale to support proposed hotel, prepared by Montagu Evans (Appendix 4); - Needs Case to Support the Ebbsfleet United FC Northfleet Harbourside Development, prepared by Damian Irvine, EUFC (Appendix 5); - Northfleet Harbourside Design Code Rev A, 24 August 2023, prepared by HLM (Appendix 6); - Transport Assessment Addendum, prepared by Vectos (Appendix 7); - Biodiversity and Ecology response, prepared by Trium / Schofield Lothian (Appendix 8); - RMA Response Letter to EA Including Appendices (Appendix 9).
Appendix II – Environmental Statement High Level Review	- Annex C: Preliminary Ecological Appraisal and Annex D: TVIA Supporting Maps are missing. The annexes were issued to GBC on 13th June 2023. - It is not apparent whether the ES is based on the Scoping Opinion.

	Please refer to Northfleet Harbourside Response to Avison Young Independent Environmental Statement Review Report, prepared by Trium. - The document called Chapter 3: Alternatives and Design Evolution actually contains Chapter 2: EIA Methodology. Therefore, the ES chapter on Alternatives and Design Evolution is missing. These documents were issued to GBC on 13 June 2023. - There is no discussion on (or evidence provided in relation to) whether a Habitat Regulations Appropriate Assessment is or isn't required in relation to the Thames Estuary & Marshes Ramsar and SPA. Please refer to Northfleet Harbourside Response to Avison Young Independent Environmental Statement Review Report, prepared by Trium.
Appendix III – Masterplan Design Review	Responses provided within the Northfleet Harbourside Design Code Rev A, 24 August 2023, prepared by HLM (Appendix 6).
Appendix IV – Financial Viability Review	Responses provided in table.
Appendix V – Retail and Leisure: Planning Policy Review	Responses provided within Addendum Retail and Leisure Statement, prepared by Montagu Evans (Appendix 2).
Appendix VI – Employment and Economic Review	Responses provided in table.
AY Detailed ES Comments July 2023	Responses provided within Northfleet Harbourside Response to Avison Young Independent Environmental Statement Review Report, prepared by Trium.

We trust that the above and enclosed is self-explanatory and helpful. If you require anything further, please do not hesitate to contact Jon Bradburn (jon.bradburn@montagu-evans.co.uk / 07818 012 452), Polly Mason (polly.mason@montagu-evans.co.uk / 07818 012 403) or Alex Partridge (alex.partridge@montagu-evans.co.uk / 07584 154 762) at this office.

Yours sincerely



MONTAGU EVANS LLP

Enc.