

30 July 2025

Wendy Simpson
Ebbsfleet Development Corporation
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet
Kent
DA10 1EE

Amanda Cue
Planning and Regeneration Services
Civic Centre,
Windmill St,
Gravesend
DA12 1AU

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, set against a yellow rectangular background.

Gregory Evans
E: grevans@savills.com
DL: +44 (0) 207 409 8024

33 Margaret Street
London W1G 0JD
T: + 44 (0) 20 7499 8644
F: + 44 (0) 20 7495 3773
savills.com

Dear Wendy,

App Ref: EDC/25/0081

**Land to the North West of Factory Road, Northfleet, Gravesend, DA11 9HH
Responding to Consultee Comments**

On behalf of our client, Bellway Homes Limited (Thames Gateway), we respond to the consultee comments made to the application for a workshop at Factory Road. The application is being considered at the moment by EDC and GBC and has the following description of development:

"Full planning application for the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping."

The applicant and its team has reviewed the consultee comments to the proposal. In response, it has prepared some amended plans and its technical team has prepared responses to address queries.

Please find a summary of the relevant consultee comments below, alongside how these comments have been positively responded to.

Environment Agency

Summary of comments: The Environment Agency (EA) has requested additional information to demonstrate that the risk of pollution to controlled waters can be appropriately managed. The EA has requested information to demonstrate that the risk to controlled waters has been considered and appropriately mitigated and to include a detailed drainage strategy and a preliminary risk assessment. The drainage strategy should outline mitigation measures proposed to prevent the discharge of hazardous pollutants and limit the discharge of non-hazardous pollutants to groundwater via deep borehole soakaway.

Responding to comments: In response to the EA's comments, a Drainage Technical Note has been prepared by RLT. This confirms that the potential for leachable contamination that may impact upon controlled waters to be present is considered to be low. The Technical Note concludes that the foul water will be positively discharged into the existing adopted sewer and all surface water will be contained onsite and vertically infiltrated and will not cause any adverse effect or flooding to third party properties.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



A Contamination Assessment has been requested. Previously, a Contamination Land Assessment, prepared by IDOM Merebrook, was approved (Ref: EDC/21/0023) to discharge Outline Planning Permission EDC/16/0004 Condition 18 covering the same site that is subject to this full planning application.

With regard to Controlled Waters, the approved Contaminated Land Assessment, confirms:

Made Ground is known to overlie the permeable superficial Boyn Hill Gravel Member that in turn overlies the Chalk bedrock. A potential for undiscovered leachable contamination to impact the Chalk Aquifer exists. The risk to the groundwater from vertical migration of contaminants is considered to be moderate. The closest surface water body to the site is the River Thames approximately 350 metres to the north. The risk of horizontal migration of contaminants to the River Thames is considered to be low.

It is trusted that these additional technical note and Contamination Land Assessment report addresses the comments of the EA in full.

Port of London Authority

Summary of comments: The Port of London Authority (PLA) note the close proximity of the site to safeguarded wharfs. It has requested that an Infrastructure Assessment is prepared to assess the application on safeguarded wharfs close to the site.

Responding to comments: An Infrastructure Assessment has been prepared by Stantec, responding to this request. On this basis, it is trusted that the request of the PLA has been addressed.

Kent County Council Highways

Summary of comments: Kent County Council (KCC) Highways and Transportation Department provided comments on the application. Detailed comments were provided by KCC requesting clarification on access arrangements, parking provision and details, visibility splays as well as traffic speed details. KCC Highways requested updates to plans and additional information.

Responding to comments: A Transport Technical Note 2 has been prepared by Stantec, to provide additional information and respond to KCC Highways comments. The Technical Note includes an amended landscape and parking design and further visibility splays have been provided.

It is considered that this response addresses KCC Highways queries.

Noise

EDC Noise Consultant Comments

Summary of comments: EDC's noise consultant, Bureau Veritas, provided comments with regards to the findings of the Noise Impact Assessment (NIA) and required further measures to be incorporated.

Gravesham Borough Council Environment Health (16 July 2025)

Summary of comments: Similarly, the Gravesham Borough Council Environmental Health Officer provides comments requesting that the NIA be revised to take account of specific noise levels.

Responding to comments: The Noise Impact Assessment, prepared by Stantec, has therefore been revised to respond to these comments, with plant noise emission limits updated so that they reflect the standard condition.

It is considered that this updated Noise Assessment addresses the comments provided by both EDC's noise consultant and the Gravesham Borough Council Environmental Health Officer.

Application Documents

We enclose the following documents to comprise this response:

- This Covering Letter, prepared by Savills
- Noise Impact Assessment (Rev 4), prepared by Stantec
- Transport Technical Note 2, prepared by Stantec
- Infrastructure Assessment, prepared by Stantec
- Proposed Site Layout – Ground Floor Plan (MRT-BPTW-S01-ZZ-DR-A-1001 C04), prepared by BPTW
- Proposed Site Layout – First Floor Plan (MRT-BPTW-S01-ZZ-DR-A-1002 C04), prepared by BPTW
- Landscape Proposals General Arrangement (13281-LUC-TW-XX-DR-L-1001 P05), prepared by LUC
- Drainage Technical Note, prepared by RLT;
- Contaminated Land Assessment, February 2021 (Ref No. L-17855cz-2.4.2-21-72-CJB) prepared by IDOM Merebrook

I trust that the enclosed is in order and I look forward to receiving confirmation that the updated documents have been received and re-consulted on. Please feel free to contact myself or my colleague George Daniel (george.daniel@savills.com) if you have any queries or would like to discuss.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Greg Evans", written in a cursive style.

Gregory Evans
Associate Director

Enc. As listed