

Please ask for: Wendy Simpson
Our Ref: EDC/26/0075
Date: 1 July 2026



Sent by email only to:
planning.reps@gravesham.gov.uk

Ebbsfleet Development Corporation
The Observatory
Castle Hill Drive
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 5 June 2026 inviting the views of the Ebbsfleet Development Corporation (EDC) on the above planning application currently under consideration by the Borough Council.

We note that since our previous comments were provided in September 2025 (EDC ref EDC/25/0151) a number of revisions to the submission have taken place and these items are seen on the application file following the date of our last comments:

- Land Ownership Plan (Revised April 2026)
- Flood Risk Assessment (September and October documents)
- Revised Site Layout Plan (May 2026)
- Preliminary Ecological Assessment (PEA) (September and October documents)
- Battery Safety Management Plan (September and October documents)
- Planning Statement
- Design and Access Statement
- Land Contamination Preliminary Risk Assessment
- Firewater Mitigation Plan
- Reptile Survey and Mitigation Strategy
- Dormouse Survey and Mitigation Strategy
- Land Registry Plan
- Highway Search Plan
- Revised Application Form and Certificate B
- Revised Site Location Plan (May 2026)

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 there has recently been granted outline planning permission, under

EDC reference EDC/22/0168, for major mixed use redevelopment of land around Ebbsfleet International Railway Station. (Approved 17 March 2026 subject to S106.)

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. **Development Description** – whilst the new application form has amended the description of the development to include the new vehicle access onto Thames Way (classified road) the application description has not yet been updated on the GBC file and consultation letter.
2. **Protected Species Mitigation** – following reptile and dormouse surveys we note that the KCC Ecologist currently does not agree that the proposed mitigation is achievable with the proposed layout.
3. **Noise Impact Assessment incomplete** - We had previously commented that the Noise Impact Assessment (NIA) did not take into consideration within the assessment noise impacts on nearby sensitive receptors within the approved Ebbsfleet Central East (ECE) residential-led strategic development (EDC ref EDC/22/0168). The ECE development should be included within the Noise Impact Assessment baseline for assessment, and we also highlight to you that the approved ECE 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.

4. **Vegetation along Thames Way** - EDC 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.
5. **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 approved strategic scale Ebbsfleet Central development (EDC/22/0168) 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.)

It is noted that KCC have also referred to the requirement for the applicant to engage with the Highways Authority, however, no further works outside of the original Traffic Management (TM) plans seem to have been recorded nor acknowledgement of the Galley Hill Road closure issue. The closure of Galley Hill reduces the window of TM works being allowed by KCC.

6. **On-going infrastructure development** – There are significant infrastructure works proposed in the vicinity of this site to enable the Ebbsfleet Garden City build out. The connection referred to by the applicant states that it will be connecting to the Northfleet East Primary Substation. This requires clarification as both substations are under construction or have been completed by EDC as part of their infrastructure works. The plan also describes electricity cables that will be laid for 1.5km via public highway. We already have a planned programme of works that include cable laying in this area. Concerns would be adverse impacts to TM plans via KCC along with connection prioritisation from UKPN.

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