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people and wildlife



Katherine Parkin
Gravesham Borough Council
Sent via email

Our ref: KT/2022/130224/06-L02
Your ref: 20221064/
2025/010/CALLIN

Date: 27 March 2025

Dear Katherine Parkin

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.

Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend

Thank you for consulting us on the above application on 25 February 2025; which has been called in by the Secretary of State for determination.

Environment Agency Position

We **remove our objection** to the tidal defence condition 35 on the basis that it is worded as follows:

Condition Thames tidal defence design

No development except demolition and enabling works shall commence until such time as a scheme for a detailed design for the proposed upgraded Thames tidal defence has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Environment Agency.

The scheme shall be broadly in line with principles outlined in the submitted Flood Risk Assessment (Flood Risk Assessment and Surface Water Drainage Strategy, Issue 9, dated 11 April 2024, project ref: RMA- C2402), in particular paragraphs 3.18, 3.22, and Appendix G.

The scheme should include, but not be limited to:

- Drawings and calculations As built drawings of the upgraded defence, including demonstrating on that the design life of all new and residual elements is a minimum 100 years from when the last dwelling is expected to be completed.
- A schedule of works.
- Tracking plans showing how construction vehicles and civil engineering plant suitable to replace all of the River Thames walls and the completed improved Tidal Defence structures within the site could access the river structures and turn and work with the new buildings and landscape features in place.
- Demonstration that as far as reasonably practical the construction vehicles and civil engineering plant identified to satisfy the above bullet point can access the River Thames frontages upstream and downstream of the site within the 16- metre offset from the existing line of the river wall, without any new structures including fencing needing to be removed. (Fencing to therefore include access gates at least 4 metres wide).
- Details of terracing, including a terrace which functions as an intertidal habitat, designed in line with Environment Agency [Estuary Edges](#) guidance.
- A plan for long-term management, maintenance and monitoring of the flood defence and river wall and the proposed intertidal zone ecological enhancements, carried out in line with Environment Agency [Estuary Edges](#) guidance
- Details of all any proposed landscaping, footpaths, lighting, street furniture and planting within the 16m area adjacent to the tidal defence identified in Figure 9 of Appendix G. Demonstration that these features will not adversely impact the structural integrity of the defence, or access to the defence for maintenance and emergency works.

The scheme shall be fully implemented prior to first occupation within the relevant phase or sub-phase and subsequently maintained thereafter, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed in writing by the Local Planning Authority.

Reasons

To ensure that the proposed development is safe in flood risk terms of future users and to enhance intertidal ecology and provide net gains to biodiversity in the Thames Estuary, in accordance with Policies CS12 and CS18 of the Gravesham Local Plan Core Strategy 2014, the [Thames River Basin Management Plan](#) and the [Thames Estuary 2100 plan](#).

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

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