

From: Bown, Kevin <Kevin.Bown@nationalhighways.co.uk>
Sent: 05 September 2022 18:45
To: Planning Admin; Polly Mason
Cc: Blake, Patrick; Spatial Planning; transportplanning@dft.gov.uk
Subject: FAO Case Officer Genna Henry: National Highways response (our ref 7576 # 17602) re EIA Scoping Opinion Case 20220852 Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesen

For attention of:	Ms Genna Henry
Site:	Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend.
Proposal:	Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.
Your Reference:	20220852
National Highways' Reference:	7576 #17602 (K392)

Dear Ms Henry,

Thank you for your letter of 15 August 2022 regarding the EIA Scoping Opinion Case referenced above; seeking a response no later than 5 September 2022.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public

interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A2 and the M25 Junctions 1a, 1b and 2.

We have no comment on whether an EIA is required; but if it is, it should be compatible and consistent with the required Transport Assessment (TA) for the application site.

TA/EIA General Guidance

Any TA and EIA assessment should be undertaken in accordance with the DfT Circular 02/2013 *"The Strategic Road Network and the Delivery of Sustainable Development"*.

The TA should include a robust assessment of the vehicular impacts "with" and "without" development for the Opening Year and a Review Period year which will be either the end of the relevant Local Plan or ten years post registration of the planning application, whichever is the greater, to assess the impact of the proposed development.

If it is likely that any SRN mitigation will be required, the EIA must demonstrate how it accords with the Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring, and we note that the latter document is referenced in bullet point 3 of paragraph 492, under EIA Approach and Methodology.

It should be noted that on 20 July 2022 we responded to a pre-application Transport Assessment Scoping Note setting out our more detailed and specific requirements. These comments remain applicable.

Construction Impacts

Paragraph 39 of the EIA report outlines that any demolition or construction related impacts will be mitigated and managed through an appropriate Construction Environmental Management Plan. This approach is welcomed, and we request that the document be reviewed and agreed in writing with the Local Highways Authority and us.

Conclusion

We trust our comments assist and look forward to early engagement with the applicant regarding the TA and any other SRN related matters as the project progresses.

In the meantime if you or the applicant (EIA agent at Trium Environmental Consulting LLP) have any queries regarding our response, please contact us at planningse@nationalhighways.co.uk.

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