

Northfleet Harbourside



Northfleet
Harbourside

Environmental Statement
Non-Technical Summary



CONTENTS

INTRODUCTION.....	2
THE SITE AND SURROUNDING AREA.....	5
ASSESSMENT METHODOLOGY.....	10
ALTERNATIVES AND DESIGN EVOLUTION.....	13
THE PROPOSED DEVELOPMENT.....	22
WASTE.....	31
DEMOLITION AND CONSTRUCTION.....	32
ENVIRONMENTAL IMPACT ASSESSMENT.....	34
SOCIO-ECONOMICS.....	34
HEALTH.....	36
TRAFFIC AND TRANSPORT.....	37
AIR QUALITY.....	37
NOISE AND VIBRATION.....	38
DAYLIGHT, SUNLIGHT, OVERSHADOWING, SOLAR GLARE AND LIGHT INTRUSION.....	39
WIND MICROCLIMATE.....	41
ARCHAEOLOGY.....	42
ECOLOGY AND BIODIVERSITY.....	43
WATER RESOURCES, FLOOD RISK, DRAINAGE AND GROUND CONDITIONS.....	45
TOWNSCAPE AND VISUAL IMPACT ASSESSMENT.....	47
CLIMATE CHANGE.....	50
CUMULATIVE EFFECTS ASSESSMENT.....	51
SUMMARY OF LIKELY SIGNIFICANT EFFECTS AND CONCLUSIONS.....	55
ES AVAILABILITY AND COMMENTS.....	56

- Figure 1** **3D Model of Maximum Massing Parameters⁴**



Figure 2 Red Line Planning Application Boundary

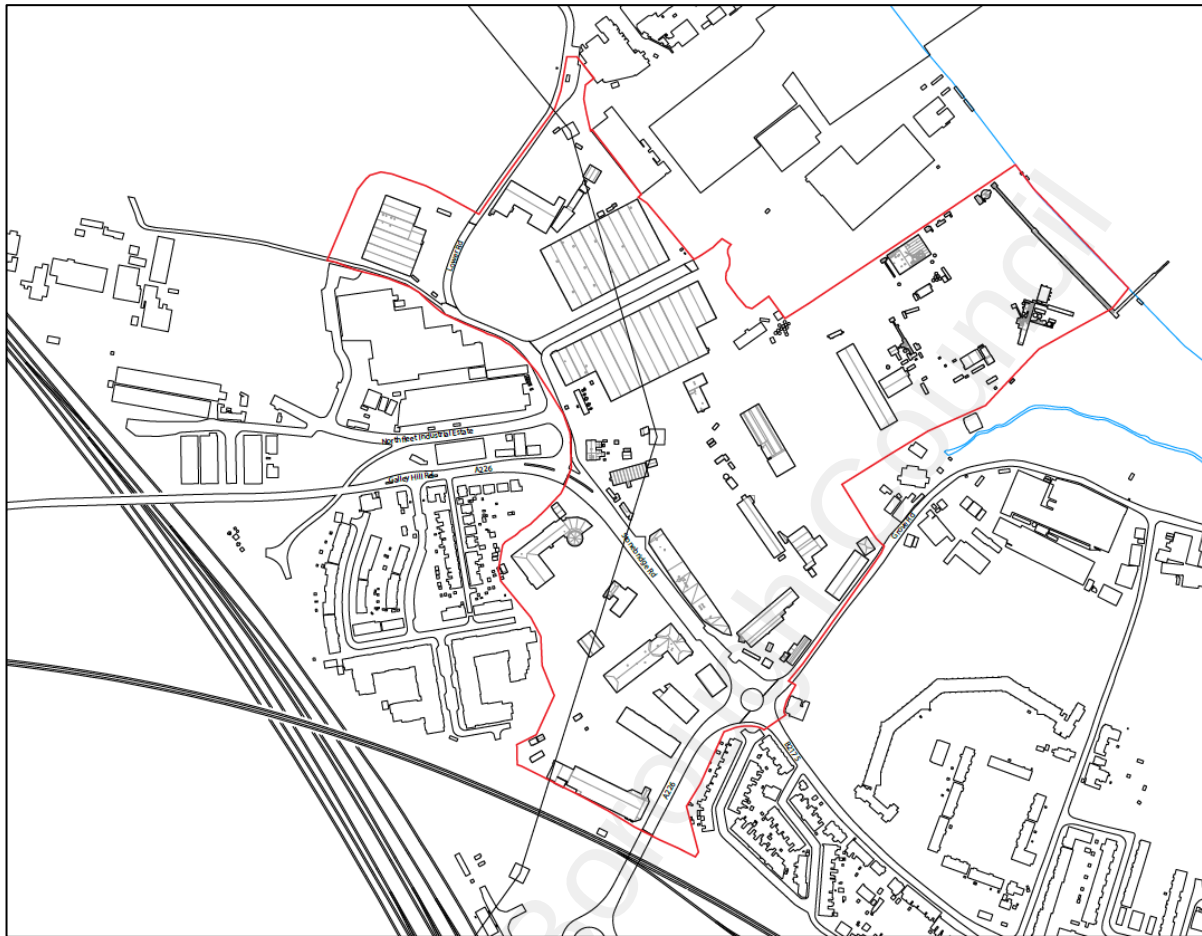


Figure 3 Site Location



Figure 4 Proposed Development Plot Boundaries

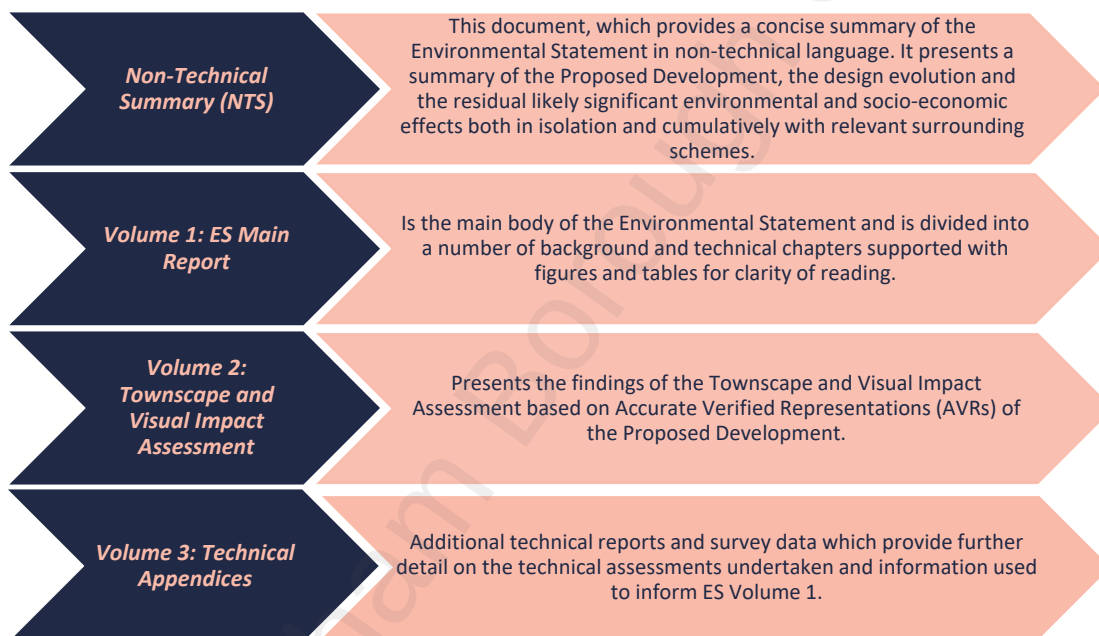


- 6 The site is 19 hectares in size and bordered by the River Thames to the north-east; industrial land to the west, south and north (including Seacon Terminals); Swanscombe Peninsula Site of Special Scientific Interest to the north-west; and residential land to the south-east and west. The site location is shown in **Figure 3**, with the planning application site boundary, also illustrating plot numbers presented in **Figure 4**.
- 7 An Environmental Impact Assessment has been undertaken for the Proposed Development. This document is a Non-Technical Summary of the findings of the Environmental Impact Assessment that are reported in the Environmental Statement. This Non-Technical Summary has been prepared to summarise the Proposed Development (that the Applicant is seeking planning permission for), the likely significant environmental effects of the Proposed Development and the measures proposed to protect the environment. The Environmental Impact Assessment has identified environmental effects that could arise during both the demolition and construction of the Proposed Development, and when the Proposed Development is complete and in use.
- 8 The Environmental Statement has been prepared in accordance with the relevant regulations relating to Environmental Impact Assessment, in particular the Environmental Impact Assessment Regulations (Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)).

Purpose of the Environmental Impact Assessment and Non-Technical Summary

- 9 Environmental Impact Assessment is a process that allows the beneficial (positive) and adverse (negative) (and sometime neutral) environmental effects of certain projects on the environment to be identified and reported upon. This is required by law and helps the Local Planning Authority to understand the likely significant environmental effects of a new development when making the decision on whether to grant the development planning permission.
- 10 Measures to protect the environment, otherwise known as ‘mitigation measures’ have also been identified as part of the Environmental Impact Assessment process.
- 11 Trium Environmental Consulting LLP (‘Trium’), in collaboration with technical specialists, has undertaken the Environmental Impact Assessment for the Proposed Development and has prepared the Environmental Statement and this Non-Technical Summary. The Environmental Statement is made up of a number of technical documents (as set out in **Figure 5**) and so this Non-Technical Summary provides an overview of the Environmental Statement in non-technical language.

Figure 5 Content of the Environmental Statement



THE SITE AND SURROUNDING AREA

Site Description

- 12 The site is currently occupied by Ebbsfleet United Football Stadium, industrial land uses including active aggregates/concrete handling and processing sites operated by Aggregate Industries and Brett Aggregates, and smaller industrial units as well as a petrol station. The A226 (Stonebridge Road) runs through the site. Open spaces on site are largely covered in concrete surfacing and areas of hardstanding. There is little to no amenity landscaping on site.
- 13 Adjacent to the northern extent of the site is Seacon Terminals which provides handling and storage of construction project material and timber. Further to the north, lies Swanscombe Peninsula, which is a designated Site of Special Scientific Interest. The site has been designated in recognition of its national

importance for plants, geology, birds and invertebrates⁵.

- 14 The River Thames borders the site to the north-east and along the eastern boundary of the site lies Robins Creek.
- 15 Northfleet Train Station and Ebbsfleet International Train station, along with railway infrastructure, are located to the south-east of the site. These stations provide Southeastern train services to London and the surrounding area, with Ebbsfleet International providing Eurostar services to Paris and Brussels in 2023.
- 16 Adjacent to the western of land boundary along Taunton Road, Robinson Way and Black Eagle Drive lies residential dwellings. Beyond these residential properties and the railway infrastructure, to the west of the site, lies green space and the village of Swanscombe.
- 17 Photographs of the site and surrounding areas to the site are presented for reference in **Figure 6**.

Figure 6 **Photographs of the Existing Site**



Buildings located in the southern portion of the red line boundary

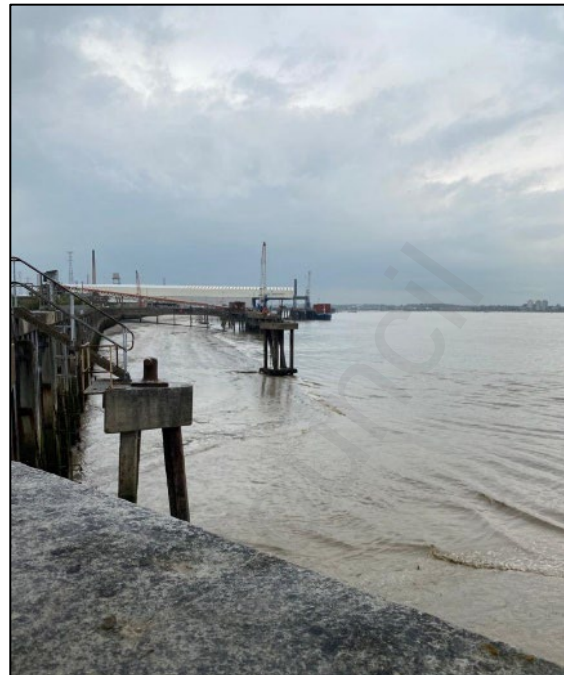


Buildings located in the north-eastern portion of the red line boundary

⁵ <https://www.gov.uk/government/news/swanscombe-peninsula-confirmed-as-site-of-special-scientific-interest>



Buildings located in the north-western portion of the red line boundary



River Thames Flood Wall along the north-eastern land boundary

Environmental Context

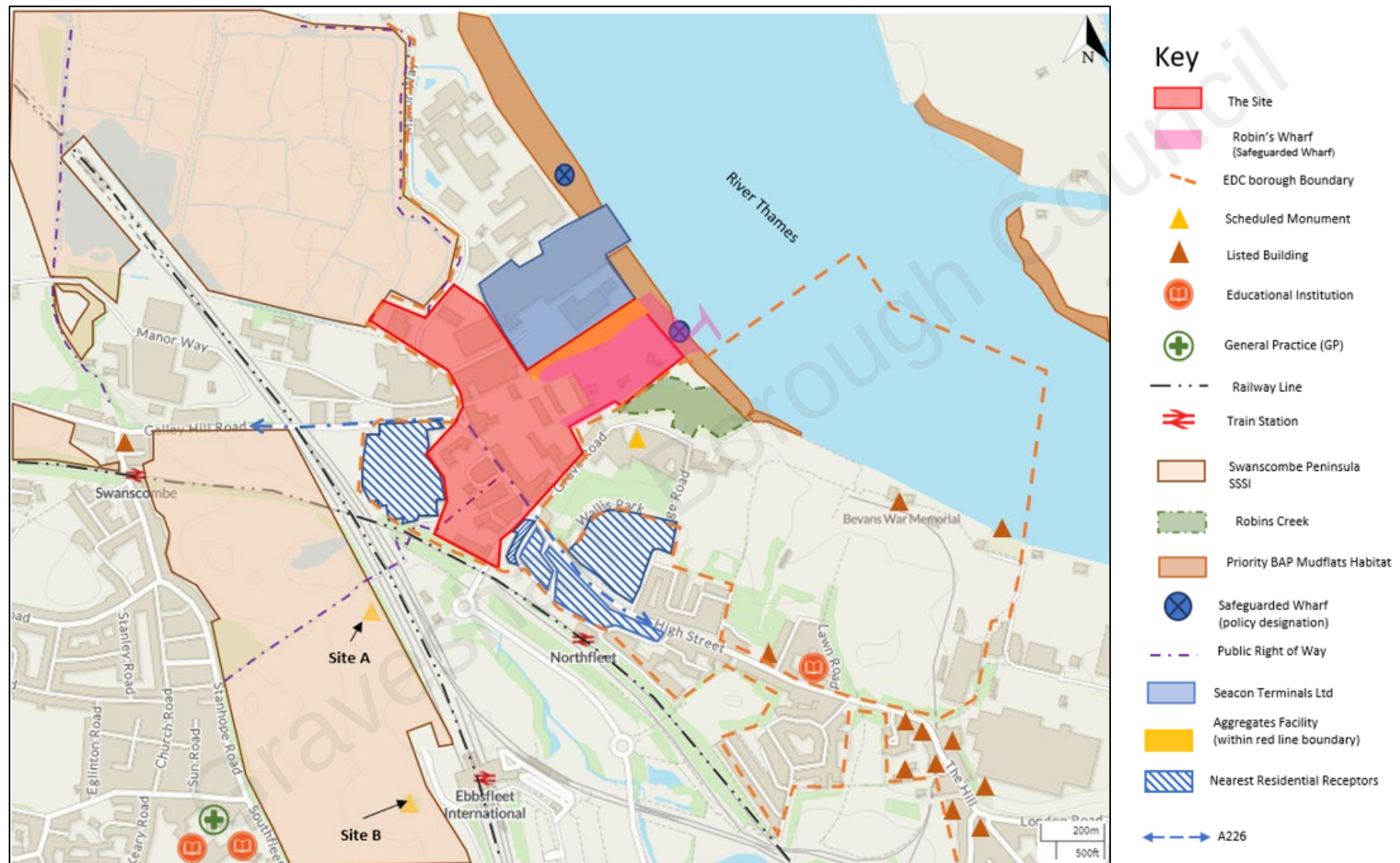
- 18 The main environmental features and designations of the site and the surrounding areas are presented in **Table 1** and **Figure 7**.

Table 1 The Site and Surrounding Area's Environmental Context

Environmental Topic	Environmental Context
Social Infrastructure (Education, Healthcare and Open/Play Spaces)	- Surrounding educational facilities to the site includes Lawn Community Primary School located approximately 800m south-east with other primary and secondary schools located within 1km. - Surrounding medical facilities to the site includes the Swanscombe Health Centre approximately 850m to the south-west of the site. Grove House Orthodontics is located within the site boundary. - The closest area of public open space to the site is Broomfield Park located approximately 830m to the west of the site.
Transport	- Northfleet Train Station is located approximately 300m to the south of the site, and provides Thameslink and Southeastern services to London Charing Cross, Luton, Rainham and Gravesend. Ebbsfleet International Train Station is located approximately 500m to the southwest of the site and provides Southeastern services to St Pancras International, Dover Priory, Margate and Faversham. From 2023, Ebbsfleet International will resume Eurostar services to Paris and Brussels. - The A226 (Stonebridge Road) runs through the site boundary and serves Seacon Terminals, located to the north of the land boundary. - There are two bus stops along the A226 (Stonebridge Road) providing services including routes 3 and 34 to Gravesend. - Footways are present along the A226 and B175, with further pedestrian routes available in the form of Public Right of Way's that provide access to the site from the southeast via a footway over the railway line. Further pedestrian routes also provide access to the Swanscombe Marshes to the north of the site. This route travels northwest from Gravesend passing through the site and into the marshes. - Vehicular access to the site can be achieved to the north of the site via Lower Road and to the south of the site via Grove Road. Pedestrian access can be gained from various points along the A226 (Stonebridge Road), Grove Road and Lower Road. - A local cycle route runs along the A226 to the south of the site, which continues southbound where it connects to National Cycle Network (NCN) Route 1, located 1.2km from the site.

Environmental Topic	Environmental Context
Air Quality	The site is situated in the Northfleet Industrial Area Air Quality Management Area. Air Quality Management Areas are areas which have been identified by the local authority as having air pollution levels which are, or are likely to, exceed national air quality objectives. The Air Quality Management Area was declared due to exceedances in the annual mean of Nitrogen Dioxide (NO₂).
Archaeology (Buried Heritage) and Built Heritage	- The Hill Conservation Area is located approximately 1km south-east, Landsdowne Square Conservation Area 930m east Overcliffe Conservation Area 920m east. - There are six Listed Buildings (all Grade II) within 1km of the site. The closest Listed Building is Bevan's War Memorial in Northfleet Cement Works (Grade II listed) approximately 750m east of the site. - The site does not contain any designated heritage assets; however, there are several heritage assets surrounding the site, including Aspdin's Kiln Scheduled Monument (approximately 140m east).
Flood Risk	- The site is predominantly located in Flood Zone 3 which means there is a high probability of flooding and the land has been assessed as having a less than 1 in 100 (1%) annual probability of river or sea flooding. However, the site benefits from flood defences which protect the site against river flooding. - The majority of the site is at very low risk of flooding from surface water. Some areas with low to high surface water flood risk areas were identified across the site in proximity to the football stadium.
Ground Conditions	The geology of the site comprises Lewes Nodular Chalk Formation and Newhaven Chalk Formation (chalk). Superficial deposits of the site comprise of alluvium (clay, silt, sand and peat).
Ecology and Biodiversity	- The site is not located within a Special Areas of Conservation, Special Protection Areas, Ramsar Sites, Sites of Special Scientific Interest, National Nature Reserves and Local Nature Reserves. - A number of designated areas are located near the site, including: - Swanscombe Peninsula Site of Special Scientific Interest located 40m east of the north-western boundary of the site, designated in recognition of its national importance for plants, geology, birds and invertebrates; - Robin's Creek borders the eastern boundary and has the potential to support schedule 1 birds; and - Mudflat habitats bordering the site at the River Thames. - With the exception of potential breeding bird habitat, the site was not identified as having a potential to support protected or notable species.
Noise and Vibration	- The likely sources of noise and vibration include traffic from the adjacent roads such as the A226 (Stonebridge Road). - Seacon Terminals (to the north) and the railway infrastructure (to the southwest) are potential sources of vibration when operational.

Figure 7 Site and Surrounding Environmental Context



ASSESSMENT METHODOLOGY

Scoping

- 19 'Scoping' forms one of the first stages of the Environmental Impact Assessment process. Scoping identifies the possible environmental effects of a development and the technical topics that need to be investigated further as part of the next stage of the Environmental Impact Assessment process.
- 20 It is through the scoping process that the Local Planning Authority and other key statutory⁶ and non-statutory consultees⁷ are consulted on those environmental topics that should be considered in the Environmental Impact Assessment.
- 21 As part of the Scoping process, an Environmental Impact Assessment Scoping Opinion under the Environmental Impact Assessment Regulations was requested from the Local Planning Authority on the 11th August 2022 (hereinafter referred to as the 'EIA Scoping Opinion Request Report'). The Local Planning Authority subsequently issued a Scoping Opinion on the 16th September 2022. The scope and structure of the Environmental Statement has been informed by the Environmental Impact Assessment Scoping Opinion.

Environmental Impact Assessment Technical Topics

- 22 Several technical topics have been considered as part of the Environmental Impact Assessment process. The below lists all the technical environmental topics considered. For some technical environmental topics, initial research and assessments, as part of the Environmental Impact Assessment scoping process, identified that no significant environmental effects would be likely and, on this basis, no further work in relation to these technical topics was necessary. These topics were therefore 'Scoped Out' (i.e., excluded) from the Environmental Statement, with supplementary environmental reports provided where required (and submitted with the planning application), as agreed with the Local Planning Authority.
- 23 Where it was considered that there was the potential for significant environmental effects to occur as a result of the Proposed Development, further detailed studies have been undertaken as part of the Environmental Impact Assessment. The topics for which further detailed studies have been carried out and reported on in the Environmental Statement are those topics that are in **bold** text in the list below:
 - **Air Quality;**
 - **Archaeology;**
 - **Built Heritage;**
 - **Climate Change;**
 - **Daylight, Sunlight, Overshadowing, Solar Glare and Light Intrusion;**
 - **Ecology and Biodiversity;**
 - **Water Resources, Flood Risk, Drainage and Ground Conditions;**
 - **Health;**
 - **Noise and Vibration;**
 - **Socio-economics;**

⁶ Statutory consultees are organisations defined by statute who must be consulted on relevant planning applications

⁷ Non-statutory consultees are organisations identified in national planning policy who should be consulted on relevant planning applications

- **Traffic and Transport;**
- **Wind Microclimate;**
- **Townscape and Visual Impact;**
- **Waste and Materials;**
- Aviation;
- Land Take and Soils; and
- Project Vulnerability, Major Accidents and Natural Hazards.

Impact Assessment Approach

- 24 The Environmental Impact Assessment process is undertaken in a number of stages, with each technical topic assessment following the same process.
- 25 Firstly, the 'baseline' is identified. The baseline considers the existing conditions of the area where the Proposed Development will be located and includes both the site itself and the surrounding area. Where relevant a 'future baseline' is established which makes reasonable predictions (based on published information and professional knowledge / experience) of the likely change that may occur across the area.
- 26 Within the (relevant) baseline conditions, a number of key environmental aspects that could be potentially affected by the Proposed Development are identified, which are defined as 'receptors'. The sensitivity of each receptor to any change as a result of the Proposed Development is identified.
- 27 The impact (i.e. the resultant change) of the Proposed Development is then identified, and the size of the impact (impact magnitude) is considered at each of the receptors. Impacts are identified during the demolition and construction works and when the Proposed Development is complete and in use.

Basis of Assessment

- 28 The planning application comprises both outline and detailed elements.
- 29 The detailed element of the planning application seeks approval for the primary access to the site via the A226 (to the south), B2175, Grove Road, Galley Hill Road (A226), Northfleet Industrial Estate, Lower Road and Seacon Terminals.
- 30 Due to the nature of outline element of the planning application, specific details are not set out as to how layout, scale and appearance (including landscaping) of the Proposed Development will come forward. Instead, these matters are to be agreed with the Local Planning Authority through subsequent planning applications (called Reserved Matters Applications). For the purpose of the Environmental Impact Assessment, documents that define, describe and limit/control the outline elements of the Proposed Development' are used as the basis for the technical assessments. These documents include:
- **Planning Statement** – a report which describes and sets out each of the parameter plans (see below) and also defines the maximum amount of land use proposed for each Use Class that could be provided across the site;
 - **Parameter Plans** – a set of development plans which define a number of aspects such as scale, layout and use types across the site, which the Proposed Development must follow; and
 - **Outline Design Code** – provides a set of outline design rules and principles which the future design of the outline elements of the planning application (such as the appearance of the buildings) will need follow.

Maximum Parameters

- 31 The purpose of the technical assessments within the Environmental Statement is to assess a reasonable worst-case scenario. What constitutes the worst-case scenario for each technical topic area differs due to the flexibility being sought by the outline elements of the planning application. For example, the maximum height and massing parameters represents a worst-case scenario for the townscape, views, daylight, sunlight overshadowing and wind microclimate assessments, given that it represents the maximum amount of massing that could be brought forward on the site which would have the greatest effect upon relevant sensitive receptors. The basis of the worst-case assessment has been clearly set out in each technical assessment reported within the Environmental Statement.

Illustrative Masterplan

- 32 The Illustrative Masterplan provides one example of how the Proposed Development could come forward within the parameters in terms of layout, scale, open space and landscaping. The Illustrative Masterplan is broadly used for informative purposes only but where relevant (such as within the Socio-Economic Assessment), has been used within technical assessments to inform the assessment of potential effects associated with how the Proposed Development could come forward. Of course, it is acknowledged that this is just one potential example of how the Proposed Development could come forward and the primary mode of assessment within the Environmental Statement is based on a worst-case scenario where the Proposed Development is built out to maximum parameters. How the EIA considers the Illustrative Masterplan is provided within the respective technical Environmental Statement chapters.

Scale and Nature of Effects

- 33 The size of the impact and how sensitive a receptor is to the impact defines the scale of an effect.
- 34 For defining the scale of an effect, the following language is used: negligible; minor; moderate and major. Specific definitions are provided within the relevant chapters of the Environmental Statement, but generally speaking the following criteria is used:
- **'Negligible'** – effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, to an environmental resource or receptor;
 - **'Minor'** - Small effect (slight, short or highly localised effect) of no significant consequence;
 - **'Moderate'** - Medium effect (limited by extent, duration of impact magnitude), which may be considered significant; or
 - **'Major'** - Large effect (considerable by extent, duration or magnitude, that may be in breach of recognised acceptability, legislation, policy or standards), which is considered significant.
- 35 For defining the nature of a minor, moderate or major effect, the following language is used: 'neutral', 'beneficial' or 'adverse' in nature. Generally speaking these terms mean the following:
- **'Adverse'** - Negative effects to an environmental / socio-economic resource or receptor;
 - **'Beneficial'** - Positive effect to an environmental / socio-economic resource or receptor; and
 - **'Neutral'** - A neutral effect is one in which either there is no noticeable beneficial or adverse effect, or, in which the effect is considered neither beneficial nor adverse overall, having made a 'net equation' judgment that takes into account both beneficial and adverse impacts.
- 36 Once the effect has been identified, the assessment then determines whether the effect is considered **'significant'** or **'not significant'**.
- 37 If a significant adverse effect is identified, measures may be proposed to reduce or remove the effect;

as mentioned above, these measures are referred to as 'mitigation measures'. Once the mitigation measures have been identified, the effect is re-assessed to understand whether the scale of the effect has changed as a result of these mitigation measures.

- 38 Effects resulting from a combination of the Proposed Development and other surrounding development schemes are also assessed. These are referred to as 'cumulative effects'. Additionally, the combination of multiple different effects from the Proposed Development on a single receptor are assessed. These are referred to as 'effect interactions'.
- 39 All of the likely effects of the Proposed Development are reported within the Environmental Statement, and the likely significant beneficial, neutral or adverse residual effects (i.e., after mitigation measures are implemented) are specifically highlighted.
- 40 This Non-Technical Summary of the Environmental Statement is required to present a summary of the likely significant effects of the Proposed Development. As such, a summary of the likely significant effects relating to the Proposed Development is contained within this Non-Technical Summary, with the detailed assessment being contained within in each relevant technical topic assessments of the Environmental Statement (**Volumes 1-3**).

ALTERNATIVES AND DESIGN EVOLUTION

- 41 The extent to which consideration has been given to the alternative sites, the option of not developing the site, and the design process that has taken place, which has been influenced by various environmental studies, public consultation, and discussions with the Local Planning Authority, is reported in the Environmental Statement. The Environmental Statement and the Design and Access Statement submitted with the planning application explain this process in more detail, and a summary is provided below.

No Development Alternative

- 42 The site is currently occupied by Ebbsfleet United Football Stadium, industrial land uses including active aggregates/concrete handling and processing sites operated by Aggregate Industries and Brett Aggregates, smaller industrial units, a petrol station and four residential houses (64-67 Stonebridge Road). Open spaces on-site are largely covered by concrete surfacing and areas of hardstanding. There is little to no amenity landscaping on site.

Ebbsfleet United Football Stadium

- 43 Ebbsfleet United is an intrinsic and important part of both the community and identity of the local area. The club has ambitions to be promoted to higher leagues. The development of a new southern stand on the Stonebridge Road elevation in 2012 provided new facilities for the club as well as partially covered seating, bringing the current capacity of the stadium to 4,769 (of which 2,179 are seated).
- 44 The club is currently supported by private finance from its owners which helps to maintain the current position, however this model has risks around sustainability and long-term financial security common among football clubs in the UK pyramid. The size of the stadium also limits other sporting and non-sporting events that can take place as a result of the capacity and/or supporting facilities on site or within the vicinity (e.g. hotel). Consequently, for the club to be viable in the long-term there is the need to improve the available facilities to enable growth by providing a 365 day per year community event site and providing important diversified revenue to the community football club.
- 45 The Proposed Development includes a new stadium with a capacity of approximately 8,000 supporters (both seated and standing options) with associated ancillary retailing outlets, function space, and training / changing facilities. This size of stadium will allow for the growth needed to become financially

stable through an increased supporter base and lettings of the stadium for other uses such as concerts and tournaments. The increased capacity will also ensure governing body ground grading compliance for promotion to EFL Champion level as a minimum should it be required in future years. This investment will provide the club with a sustainable and self-sufficient future whilst also allowing for a reinvestment of funds and much needed facilities and space into the wider community of Northfleet.

- 46 This level of investment to deliver a step-change in the quality of the stadium cannot be achieved through the introduction of supporting town centre uses (e.g. hotel, retail and food & beverage) alongside residential development of scale commensurate with that proposed. Not only does this level of development allow for the funding of the new stadium, but it also introduces a critical mass that will support the non-football functions of the stadium.
- 47 The 'No Development' option would therefore result in the loss of the above mentioned opportunities to improve the existing community function that the club facilitates, to improve the club's financial viability and to develop the non football function of the stadium.

Loss of the Industrial Use

- 48 The area is located within a Minerals Safeguarding area and also encompasses Safeguarded Minerals Infrastructure in the form of a protected wharf, known as Robin's Wharf.
- 49 Robin's Wharf is occupied by Brett Aggregates and Aggregate Industries. The wharf is a shared facility jointly used by for the importation of aggregates for direct sale or supply into added value products. CPI Mortars and North Kent Roadstone, produce ready mix concrete and asphalt for sale into local markets.
- 50 The Proposed Development results in the loss of all mineral facilities at Robin's Wharf. An Infrastructure Plan and Planning Statement has been submitted in support of the planning application. The Infrastructure Plan provides a minerals infrastructure assessment and a full exposition of the need for the Proposed Development and the benefits arising from it is contained within the Planning Statement.
- 51 With regards to the minerals infrastructure assessment, the report notes the importance of safeguarding wharves is highlighted in Kent's Local Aggregate Assessment 2021 given the decreasing reliance on land-won sharp sands and gravels.
- 52 The Infrastructure Plan, however states that the total capacity for aggregate importation per annum according to figures reported in the Kent Local Aggregate Assessment 2021 was 5.6 million tonnes, albeit the theoretical capacity is recorded at 7.3 million tonnes. At present, Kent's Local Aggregates Assessment reports wharves to be operating at 54% capacity. Imports at Robins Wharf are estimated to be 284,848 tonnes.
- 53 Between Kent's nine active/semi active (and eleven safeguarded wharves under Policy CSM 6) there is sufficient capacity within the County to absorb aggregate imports of approximately 284,848 tonnes resulting from the loss of Robin's Wharf.
- 54 Given the above, and that the site represents a large portion of the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area with the potential to provide significant socio-economic opportunities for the area associated with the new floorspace provision, the 'No Development' alternative would result in a missed opportunity to provide much needed housing, employment and social infrastructure.
- 55 Currently, there is a lack of open, green and connected spaces within the site. The existing site consists mostly of industrial uses with limited pedestrian links and permeability. The Proposed Development would substantially improve connectivity and significantly improve biodiversity across the site.
- 56 The socio-economic assessment carried out reports that that the Proposed Development is expected to employ at least an additional 1,052 (net) local jobs through direct, indirect and induced employment,

taking into account leakage, displacement and multiplier effects resulting in a Permanent, Major Beneficial (Significant) effect at the Borough level on the Gravesham Economy / Workforce.

Alternatives Sites

- 57 No alternative sites or locations have been considered for the Proposed Development. The site is located in the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area which sets out how public access to the River Thames can be achieved along with opportunities for extensive residential and commercial development within the site. The Proposed Development would therefore form part of the wider regeneration and growth strategy for the area, providing much needed green space and green corridors. The Ebbsfleet United Football Club stadium provides the key link to the existing community and an anchor point from which the Proposed Development and its functions can create the urban connection between the public transport links to the south (Northfleet and Ebbsfleet International train stations) and the River Thames to the north.

Alternative Designs

- 58 **ES Volume 1, Chapter 3: Alternatives and Design Evolution** sets out the key design considerations, the design brief, and the framework principles which have guided the evolution of the Proposed Development. The design has evolved as a result of these starting principles. No wholesale alternative designs which differ from these principles have been developed, however the design of the Proposed Development has emerged and evolved in response to feedback from the pre-application discussions with the Local Planning Authority, as well as design development, and input in relation to the technical and environmental design aspects of the Proposed Development.
- 59 Where design options have been influenced by environmental considerations and assessment work, this has been discussed within the *Design Evolution* section below.

Design Evolution

- 60 The design process has looked at various design options. These were developed in response to the consultation process and the technical aspects of the Proposed Development.

Design Considerations

- 61 The design of the Proposed Development has evolved to respond to the site and surrounding context, as illustrated in **Figure 7**.
- 62 The evolution of the Proposed Development for the site has been informed by detailed analysis of the site and its surroundings, including:
- Industrial buildings (such as Seacon Terminals) is located on the north-western land boundary;
 - The River Thames adjacent to the site (to the north) poses a flood risk;
 - The existing power lines which dissect the site, limiting the maximum heights of the proposed buildings;
 - An ecological designation (Swanscombe Peninsula SSSI) borders the site to the northwest;
 - The existing industrial zone to the north-west of the site which utilises the existing transport network within the site;
 - The railway line to the south of the site presents a public realm boundary;
 - The planning application for a residential development at Groves Road; and
 - The existing Robins Creek.

63 This resulted in the following design opportunities:

- Provision of a connection to the harbour and River Thames to the north of the site;
- Connecting the existing green links found to the south and west of the site with the Proposed Development;
- Utilising and improving access to the site, based on existing strong public transport links such as Ebbsfleet International Station to the south of the site, and the existing local and regional bus links and cycle links; and
- Re-imagining Ebbsfleet United Football Stadium, which plays a key role in the connection to both the existing local community and a link to the future users of the site.

64 Each of the above considerations in combination with the surrounding environmental context and consultation with various statutory bodies and the public, led to a collaborative process with the design team and various technical assessments. These are described in more detail below as a number of these considerations led to mitigation measures being embedded into the scheme to avoid, reduce, and offset potentially adverse environmental effects.

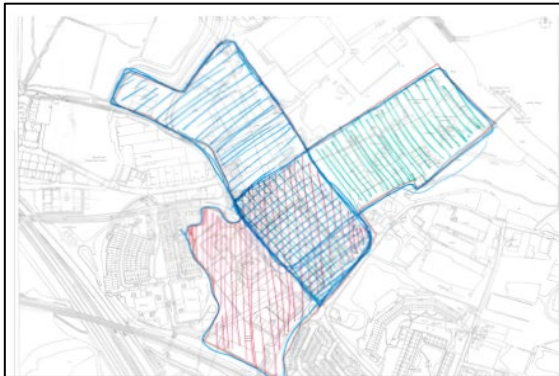
Initial Design Sketches

65 The layout of neighbourhoods and buildings, as well as the layout of the road network within the site were key points of focus during the development of early design sketches. A number of different permutations for the land use and building layouts were explored. Key considerations were:

- Diverting heavy traffic away from the heart of the Proposed Development;
- Dividing the Proposed Development into key neighbourhood areas that each have their own identity;
- Establishing a programme of how the stages Proposed Development will come forward for development;
- Creating strong green/public realm connections from adjacent green areas and linking them through the site;
- Placing the stadium at the heart of the Proposed Development, as a pivot point; and
- Creating a distinct entrance square for the entire Proposed Development to the south of the site.

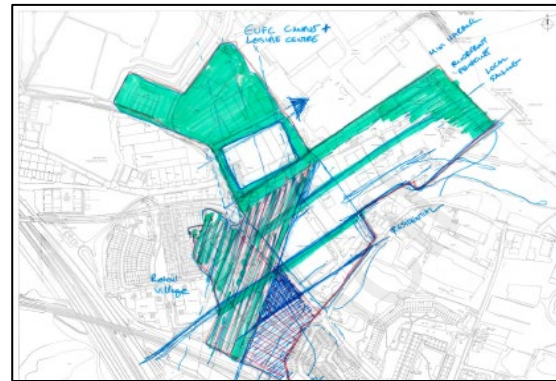
66 These key considerations were experimented with through workshops with the Local Planning Authority from 11th May to 9th June. The initial design proposal from Workshops 1 and 2 are shown in **Figure 8** and **Figure 9**.

Figure 8 Initial Design Proposals (Workshop One)



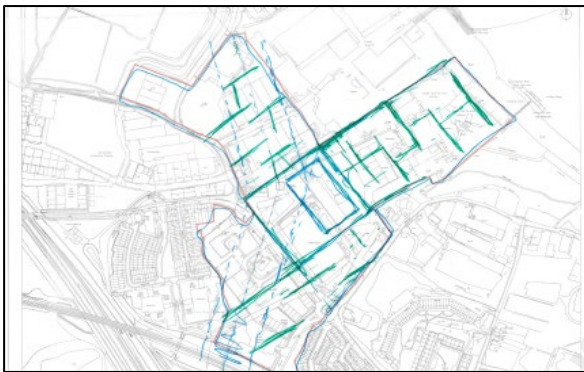
Neighbourhoods

Initial sketch of an urban strategy, dividing the Proposed Development into a series of distinct neighbourhoods.



Neighbourhood Programme Sketch

Initial sketches on the placement of key construction programmatic elements of the design.



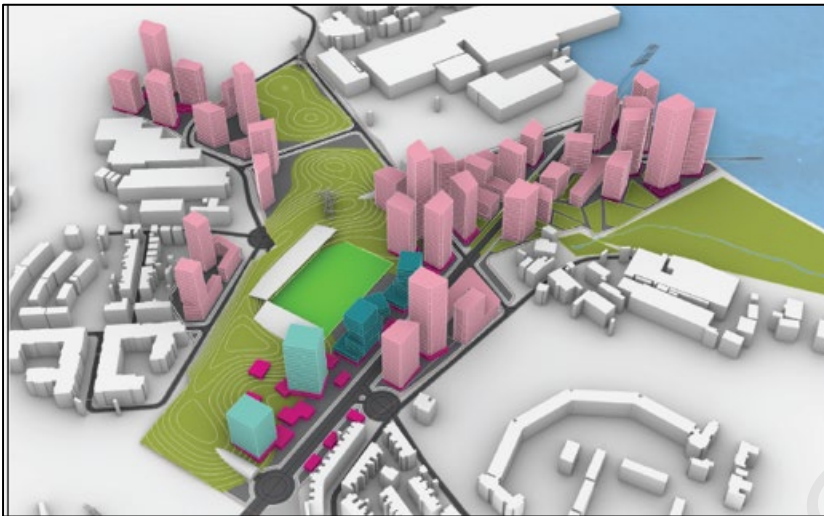
Neighbourhoods

Initial sketch of a strategy to place the stadium at the heart of the Proposed Development

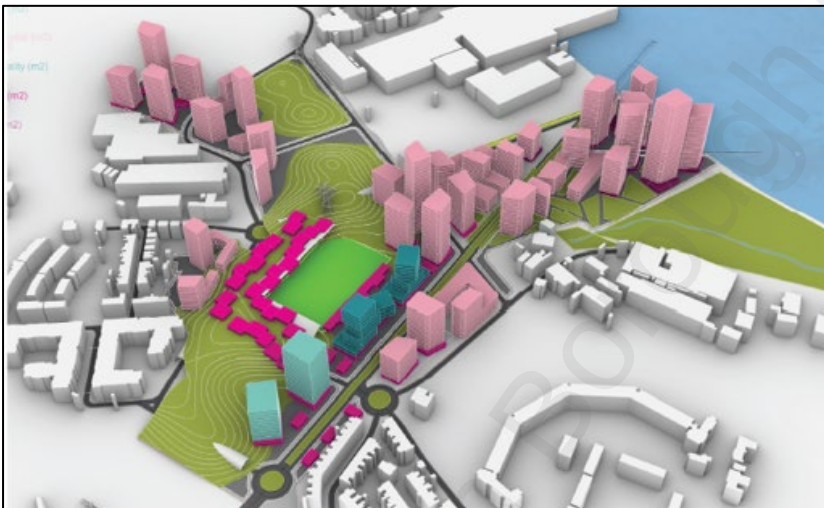


Crossing Trajectories

Initial sketch of an urban strategy to allow neighbourhoods to cross over and flow into one another defining spaces in a less strict definition

Figure 9 Initial Design Proposals (Workshop Two)**Option 2A:**

This option explores the placement of the south-east / south-west connecting route along the furthest southern position in the masterplan.

**Option 2B:**

This option explores the placement of the south-east / south-west connecting route centrally underneath the retail village adjacent to the stadium.

**Option 2C:**

This option explores the placement of the south-east / north-west connecting route as a dividing element between the retail village and stadium massing whilst remaining under the terrain.

- 67 Following feedback from the Local Authority, the adopted Option 2B, was taken forward as the preferential Proposed Development design strategy at the time, as it allowed for the retail village to be at the heart of the development, adjacent to the stadium, and for the transport network to be diverted underneath the retail village (thus improving the public realm experience).
- 68 Further workshops took place to discuss the retail experience, landscape and public realm, the eastern

and western stadium sides, massing, neighbourhood areas (**Figure 10**) and the relationship between the stadium and its surrounding context. Initial massing views were presented at Workshop 4 which presented the maximum parameter envelope of the Proposed Development, with a focus on the southern entrance as a central arrival point for the local context (**Figure 11**).

Figure 10 Key Neighbourhood Areas

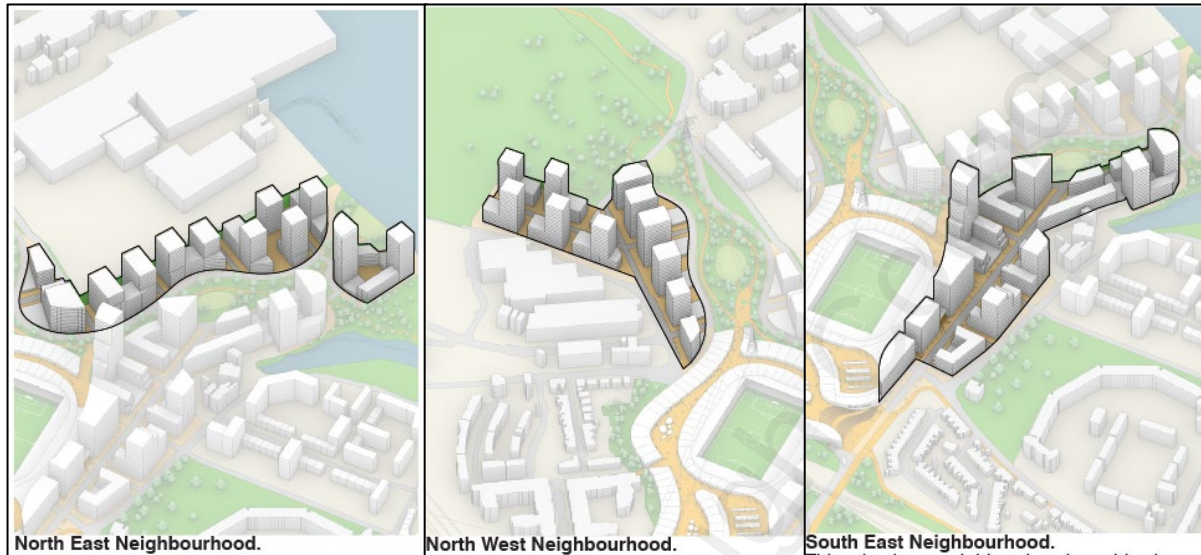
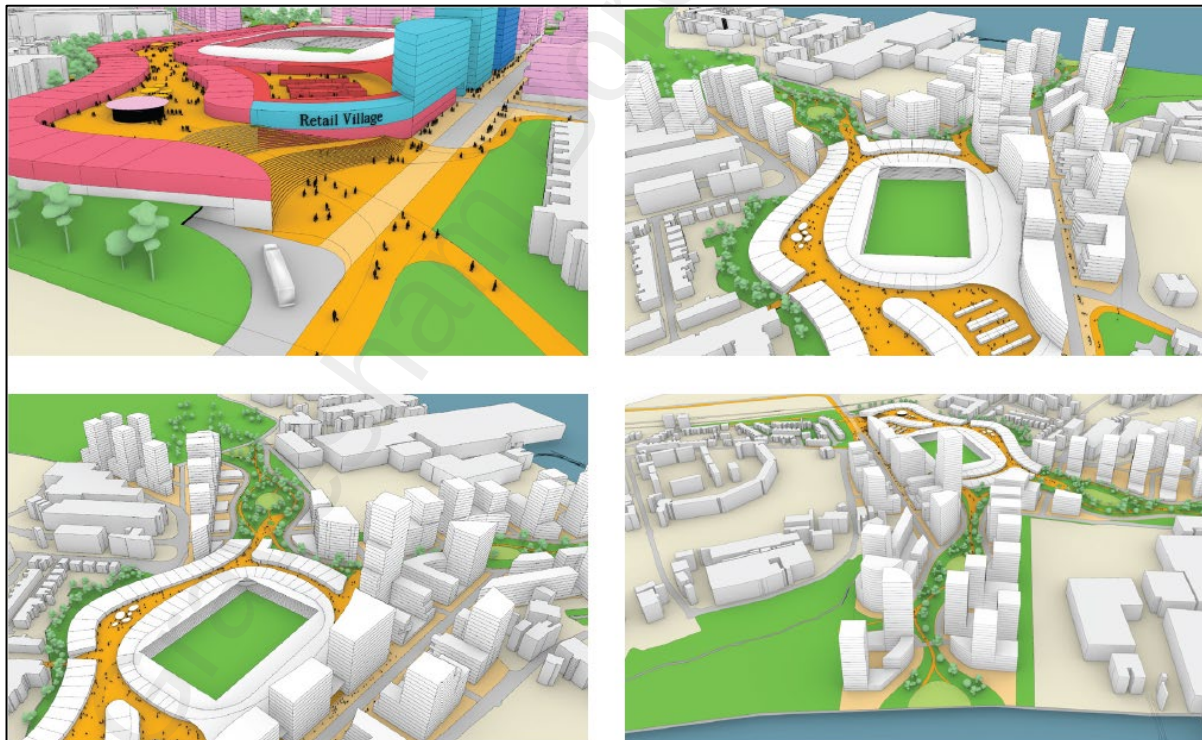


Figure 11 Initial Massing Views



Site Layout

- 69 Following the initial sketches, consultation discussions and feedback from the Local Authority, the iterative design process has allowed for an evolved design which incorporates a central spine, connecting the existing High Street, A226 and the Proposed Development along the primary pedestrian

retail and stadium public realm route. This has ensured that the stadium and associated activities are routed within the existing context and are physically and visually connected to the local community and local transport routes. Integration of the Proposed Development into the existing context has been one of the main considerations in the creation of new routes and public realm elements.

- 70 The design has evolved with regards to building and public realm placement to connect the site to the surrounding green network, with a green links between the site and the adjacent green spaces.
- 71 Highways access and circulation routes through the site have also informed the evolution of the site layout, enabling routes which are strategically located to ensure local industrial truck routes, existing bus routes and the Proposed Development work together in combination with each other.
- 72 The key evolutions to the design are:
- The establishment of a tunnel route connecting the Galley Hill Road to the A226, which logistically allows for local industry to function as normal;
 - The connection of the B2175 into the Boulevard, which allows for the Manor way to the North and A226 to the South-West to be connected; and
 - The establishment of a route from Galley Hill under the Marketplace podium, through the Parkland, Riverside and Boulevard neighbourhoods and connecting back to the B2175, allowing for the existing bus route to service the Proposed Development while retaining its local connection.
- 73 The design has also evolved to be arranged into a series of Neighbourhoods: Stadium, Marketplace, Parkland, Boulevard and Riverside. Each neighbourhood has evolved to establish its own identity by taking into account the surrounding uses adjacent to the site, but each neighbourhood also retains a connection to the Proposed Development as a whole. The green public realm has also been developed to tie these neighbourhoods into one cohesive development.

Statutory Consultation

- 74 The design of the Proposed Development has evolved further through a series of workshops undertaken with GBC and other key stakeholders. As part of this consultation process, the Proposed Development has evolved to respond to clarifications or requests by key stakeholders. This consultation has included:
- GBC Pre-Application Meetings:
 - 5th May 2022;
 - 15th June 2022; and
 - 24th August 2022.
 - Other Stakeholder Meetings:
 - 5th July 2022 – Councillor Briefing Meeting;
 - 6th July 2022 – Press night and supporters briefing;
 - 7th July 2022 – Presentation to Gravesham Borough Council Management Team;
 - 12th July 2022 – National Grid;
 - 15th and 26th August – Kent County Council Minerals;
 - 22nd August – Update to councilors issued invitations for briefing;
 - 5th September 2022 – Briefing to councilors; and
 - 6th September 2022 – Briefing to Ebbsfleet United Football Club (EUFC) Executives.

Public Consultation

- 75 The public consultation process began in July 2022 and included a number of events and exhibitions outlined below:
- Three days of public exhibition (drop-in events) on the 20th and 23rd of July 2022;

- Further drop-in events on 7th and 8th September 2022;
- 20,000 postal newsletter issue, with a total of two newsletters issued (one in July and one in August);
- Public webinar sessions (made available online) on 22nd July, and 9th and 12th September 2022;
- Dedicated website for the Proposed Development;
- Tours of the site with leaders of the council and councillors
- Numerous stakeholder meeting with Councillors, EUFC supporters, GBC Executives, local MP and Gravesham Access group;
- Social media presence with a reach of 7,445 and 427 clicks;
- A total of 69 email subscribers to the website;
- A total of 50 forms with questions/ suggestions received; and
- A series of 4 workshops held to gain feedback on the design process.

Key Environmental Considerations and Design Influence

76 The Environmental Impact Assessment team has worked alongside the Design Team to ensure that 'mitigation by design' principles have been incorporated into the evolving design, and so the evolution of the design has included, where relevant, consideration of environmental effects and issues and how these can be best addressed. Key environmental aspects which have informed the evolution of the scheme include:

- **Noise and Vibration and Air Quality:** Landscape buffering in the form of a 'green curtain' has been implemented along the northern boundary of the site close to proposed residential dwellings and the industrial uses to the north of the site. The Design Code also sets out design measures including acoustic balconies or winter gardens for specific plots to ensure external amenity spaces and appropriately designed. In order for there to be no increase in ambient noise levels from the baseline measured, the acoustic system in the stadium will be designed appropriately, along with maintaining the current design intent of the stadium, i.e. enclosed except above the pitch. In addition to this, the design team have paid particular attention to the reduction of car use and the promotion of more 'electric vehicle use'; the separation of heavy vehicles from the public realm through the design; incorporation of high quality green space and a commitment to achieving 20% increase in biodiversity; and Net Zero Emission building ambitions;
- **Daylight, Sunlight and Overshadowing:** In order to reduce the potential adverse effects on neighbouring daylight and sunlight amenity, the massing has been arranged so as to minimise the impacts on neighbouring properties as well as to allow for good levels of amenity within the proposed accommodation, courtyard and park spaces. The tallest buildings have been located towards the industrial, harbour and parkland (north-east and north-west of the site) to maximise the potential for views, visual connection towards the natural context of the site and in order to keep massing closer towards the residential edges of the site;
- **Ecology, Landscaping and Biodiversity:** Following discussions between the landscape architects and the project ecologists, it was recognised that recreational pressure arising from the completed Proposed Development could have adverse effects upon Swanscombe Peninsula SSSI located to the north-west of the site. The Proposed Development public realm has been designed to ensure it provides sufficient high-quality amenity green space based upon the population yield calculations to accommodate the occupants of the Proposed Development in order to mitigate excessive footfall within the SSSI. Once detailed design is available for the Proposed Development, Kent Wildlife Trust and NE will be consulted to discuss any potential further mitigation measures (as required and relevant) to be incorporated into the detailed design of the Proposed Development. This may form specific on-site detailed landscaping measures or

off-site financial contributions to aid management/maintenance of the SSSI, however this will be discussed and agreed;

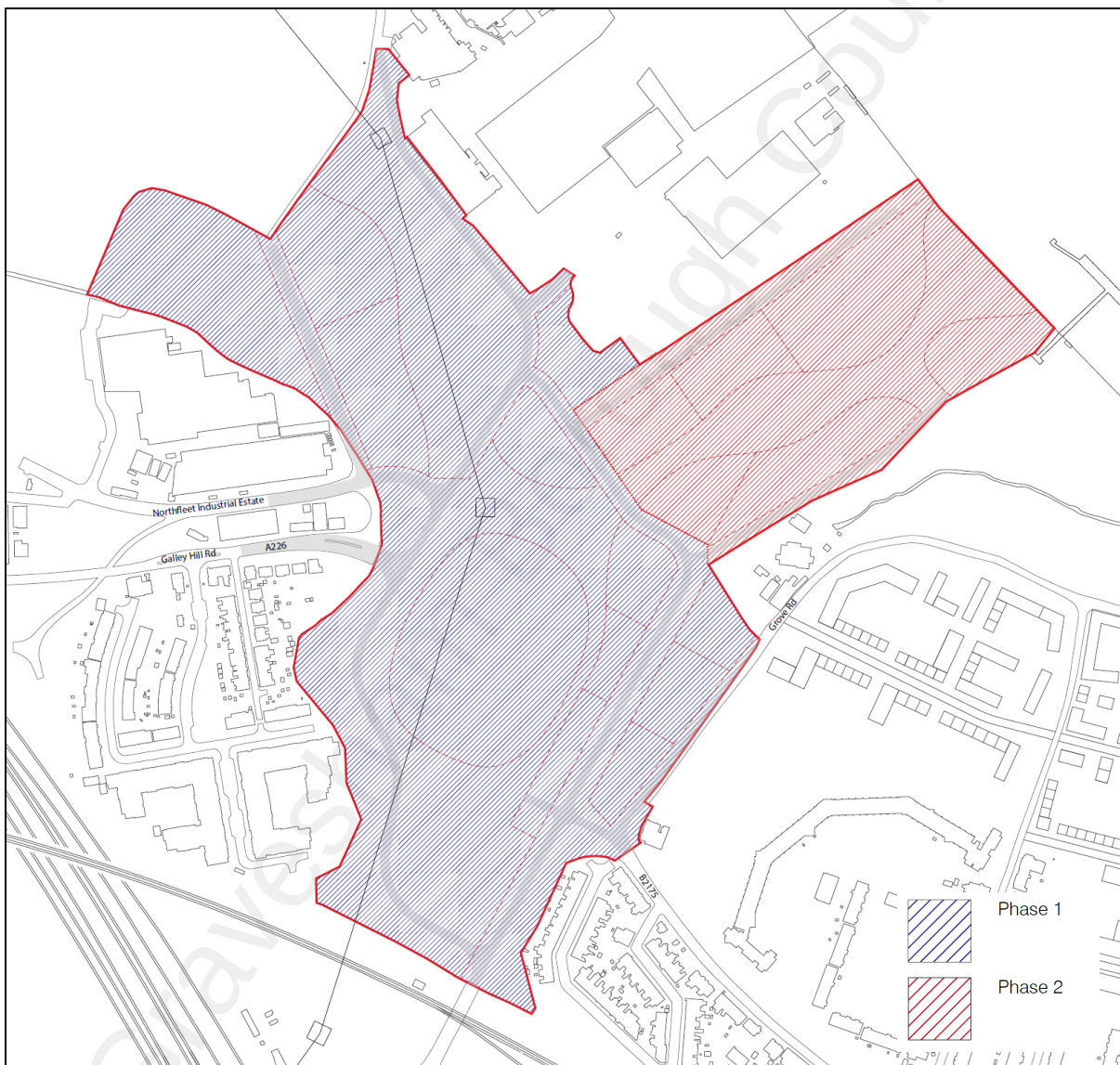
- Townscape, Visual and Built Heritage:** Consideration has been given to the presence of established industrial/residential areas that will continue as existing following implementation of any forthcoming consent for the Proposed Development through the layout and massing of the Proposed Development. This includes settled residential areas near the site edge, including those near Robinson Way and Railway Street, as well as to the south-west at Swanscombe within the administrative boundary of Dartford Borough Council. Further detail is set out in **ES Volume 2, Townscape, Visual Impact Assessment, ES Volume 2, Appendix Heritage Statement and ES Volume 1, Chapter 4: The Proposed Development**; the character and appearance of Botany Marshes (which forms part of the Swanscombe Peninsula SSSI) has been a consideration, as well as the River Thames and the long views that are afforded from areas to the north. The potential impact of the Proposed Development upon views has been a key consideration throughout the design evolution process, and a repeated topic of discussion within the pre-application consultation. The use of high-quality design and materials (committed to via the Design Code) and the replacement of an area of low townscape quality with new architecture of high quality will enhance the existing townscape and quality of public realm and mitigate the effect of the taller buildings within the Proposed Development;
- Flood Risk and Drainage:** The Proposed Development has incorporated a number of measures, such as Sustainable Drainage Systems (SuDS), into the design in coordination with the project flood risk and drainage team in order to reduce flood risk and provide amenity and biodiversity benefits. Sustainable drainage features have been integrated within the design to promote the interests of both drainage and habitat creation and will include various measures in accordance with the requirements set out in the Design Code; and
- Wind Microclimate:** The wind microclimate within and surrounding the site has been closely considered throughout the design evolution process with regards to meeting appropriate comfort and safety criteria for wind conditions. An initial analysis was carried out on the early design maximum massing parameters in July 2022, which highlighted potential areas of comfort and safety concern within the site, which were primarily located between the residential towers to the north-west of the site, and around the building closest to the waterfront. As such, the building parameters at these locations were amended by the design team with the aim of improving comfort conditions and reducing the potential for safety concerns. This included creating buildings at the north-west of the site in order to remove the thoroughfares where the wind was channelling between buildings and amending the massing of the building at the north-east extent of the site next to the River Thames. Mitigation measures have been applied and incorporated into the Design Code after the final CFD analysis to maximise comfort across the site for future users including denser tree planting and the use of evergreen trees instead of deciduous trees, hedge planting and ground level screening. Buildings were assessed for their suitability for balconies with many areas being suitable; with some not suitable controlled through the Design Code and some requiring measures such as side panels.

THE PROPOSED DEVELOPMENT

- 77 The Proposed Development will provide up to 3,500 residential units, as well as a hotel, a new stadium with associated business and leisure facilities, a range of commercial, business and services uses including retail, office and food and beverage and community uses. In addition, the Proposed Development will provide associated public realm and hard and soft landscaping, highways works, car parking, access and servicing arrangements, infrastructure and ancillary works and associated works.
- 78 The planning application seeks approval of outline parameters for the Proposed Development described above with the exception of the primary means of access into and out of the site via the A226 (to the south), B2175, Grove Road, Galley Hill Road (A226), Northfleet Industrial Estate, Lower Road and Seacon Terminals.

- 79 The Proposed Development will be delivered broadly in two main phases:
- Phase 1 to comprise Plots 1, 2, 3, 4, 5, 6, 7, 8, 15, 16, 17, 18, 19; and
 - Phase 2 to comprise Plots 9, 10, 11, 12, 13, 14.
- 80 The area of land which comprises Phase 1 of the Proposed Development is referred to as the 'Phase 1 site area'. The area which comprises Phase 2 of the Proposed Development is defined as the 'Phase 2 site area'.
- 81 **Figure 4** illustrates the 19 plots within the Proposed Development. **Figure 12** illustrates the indicative phasing of the Proposed Development with regards to the Phase 1 and Phase 2 site areas.

Figure 12 Proposed Development Indicative Phasing Plan



Arrangement, Layout and Scale of the Proposed Development

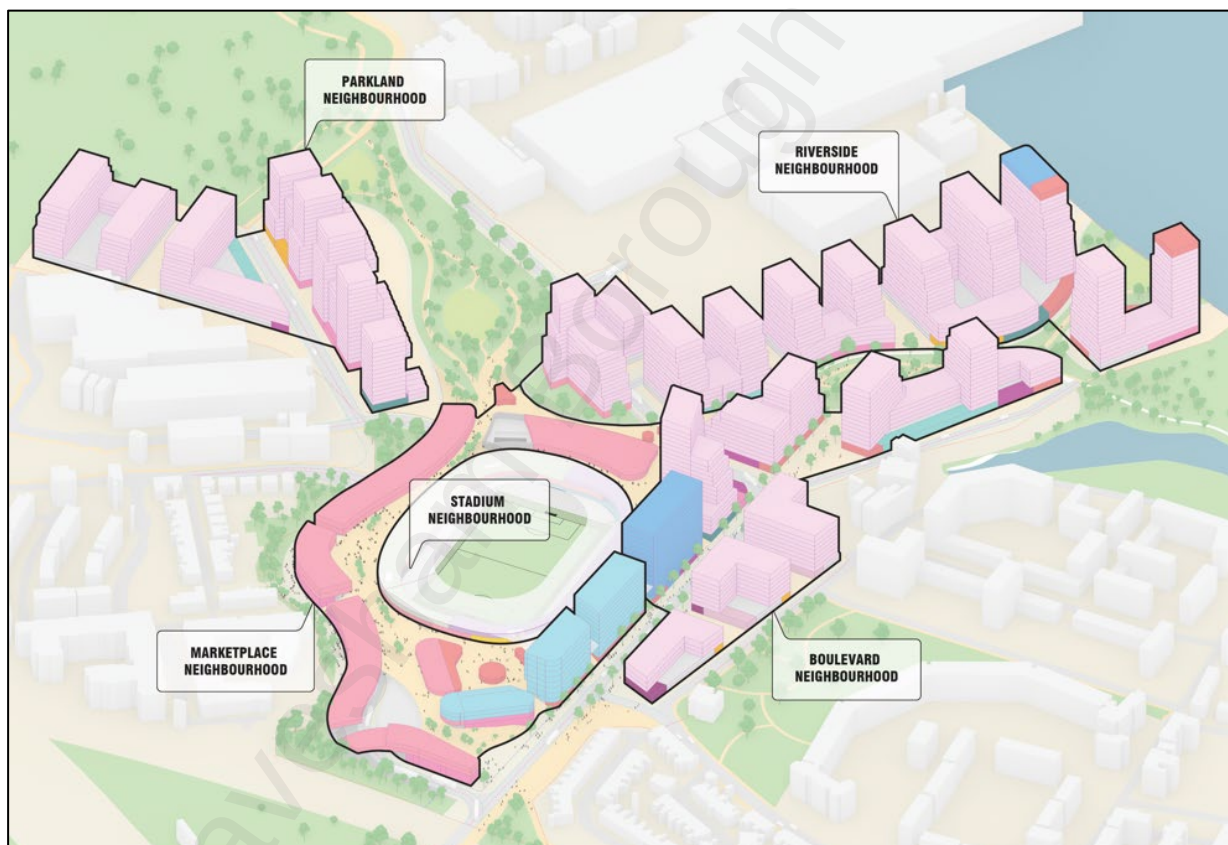
Neighbourhood Character Areas

- 82 There are five Neighbourhood Character Areas proposed as part of the Proposed Development. Each Neighbourhood Character Area contains a diverse mix of scale, with building height ranging from up to 2 floors to the tallest blocks at up to 20 floors.

83 The five Neighbourhood Character Areas (illustrated in **Figure 13** below) are as follows:

- **Marketplace Neighbourhood Character Area:** This proposed neighbourhood will mark the main arrival point of the Proposed Development and contains a meandering podium route along which two levels of flexible non-residential land uses and local community uses;
- **Stadium Neighbourhood Character Area:** The stadium will lie at the heart of the Proposed Development, bringing the past and future of the site together in one space. This 8,000 capacity stadium will contain the functions of car parking, non-residential use and a football pitch;
- **Boulevard Neighbourhood Character Area:** This proposed neighbourhood will create a strong organisational boundary comprising non-residential land uses, a hotel and residential use;
- **Riverside Neighbourhood Character Area:** This proposed neighbourhood will create the connection between the Proposed Development and the River Thames Harbour. The area will be comprised of both residential and non-residential land uses; and
- **Parkland Neighbourhood Character Area:** This proposed neighbourhood will have several ground floor uses including non-residential uses, local community uses, and residential use.

Figure 13 Proposed Development Neighbourhood Areas (Illustrative)



Land Use and Quantum of Development

84 As the Proposed Development has not been designed in detail, there are only maximum amounts of development which could come forward across the Proposed Development. **Table 2** presents the maximum proposed amount of development per use class for the Proposed Development.

Table 2 Proposed Maximum Quantum of Development – per Land Use

Land Use	Use Class	GEA (m ²) / Units ⁸
Residential	C3	3,500 units
Hotel	C1	20,000m ²
Stadium and Associated Facilities	Sui Generis	15,000m ²
Retail ⁹	E(a)	22,500m ²
Food and Beverage	E(b)	9,500m ²
Office	E(g)	18,000m ²
Non-residential Flexible Use ¹⁰	E(c, d, e, f)	5,000m ²
Local Community Use	F2	4,000m ²

- 85 The Proposed Development is anticipated to provide 90% private housing and 10% intermediate affordable housing, although the precise quantum of affordable housing to be delivered will be confirmed at reserved matters stage.

Maximum Development Parameters – Scale and Massing

- 86 The maximum building height within each plot is provided in **Table 3**.

Table 3 Maximum Building Heights

Plot	Maximum Height (metres Above Ordnance Datum)
Plot 1	24.32
Plot 2	21.92
Plot 3	55.42
Plot 4	71.42
Plot 5	71.42
Plot 6	23.42
Plot 7	39.42
Plot 8	39.42
Plot 9	55.42
Plot 10	55.42
Plot 11	71.42
Plot 12	71.42
Plot 13	55.42
Plot 14	55.42
Plot 15	39.42
Plot 16	71.42
Plot 17	71.42
Plot 18	71.42
Plot 19	39.42

⁸ With regards to residential use.

⁹ Note, whilst the overall retail provision is expressed as a total figure, the Proposed Development has been assessed on the basis of predominantly comparison retailing, with small-scale convenience to support the local population. Unit sizes will be restricted through condition, which will deliver a development that accords with the assessment undertaken and prohibit alternative forms of retailing such as large-scale convenience (i.e. supermarkets).

¹⁰ Comprising local services, indoor sport, recreation and fitness, medical or health services, crèche or nursery, etc

Appearance and Materials

- 87 The appearance of Plots 1-19 and materials utilised will be subject to future Reserved Matter Applications, based on the details and controls set out in the Design Code submitted with the planning application. The appearance of buildings will respond to each relevant Neighbourhood Character Area in accordance with the Design Code which suggests appropriate colour palettes drawing upon historical contexts and artistic influences across the site.
- 88 Residential building materials within the Parkland, Riverside and Boulevard Neighbourhood Character Areas will respect the historical material palette of the surrounding context, with the Design Code noting the objective of providing high quality, durable and sustainable materials. The materiality of the Proposed Development, as per the Design Code, will be based upon a number of key principles, including:
- The use of different tones to identify the specific character of each area using tone and texture;
 - Breaking up elevations to avoid a long linear block expression; and
 - Mixing and matching materials so each urban block has its own distinctive character while still reading cohesively as a part of the whole.
- 89 The Market Place Neighbourhood Character Area key principles include a design palette which reflects the industrial character of the existing site by utilising materials reminiscent of industrial architecture in a contemporary way.
- 90 Regarding the Stadium Neighbourhood Character Area, the Design Code notes that specified materials should be durable, weather beautifully and consider long-term maintenance requirements from the outset. Sustainability should be paramount and recycled materials should be encouraged where possible.

Landscaping and Public Realm

- 91 The Illustrative Masterplan includes a site-wide illustrative landscaping masterplan (as illustrated in **Figure 14**) for the Proposed Development which comprises areas of public open space, communal amenity space, play space and increased connectivity to the surrounding area. Specific commitments with regards to landscaping, public realm, open space, play space and minimum area requirements are set out within the Control Documents.
- 92 The illustrative public realm proposals for the site are underpinned by the following objectives:
- Over 3ha of parkland including riverside gardens, pocket parks, green streets, allotments, productive rooftops gardens and water features;
 - A multi-functional amphitheatre space located in the Riverside Neighbourhood Area, providing opportunity for events, outdoor cinema and community interactions;
 - Carefully and sensitively designed landscaping to achieve a minimum 20% Biodiversity Net Gain, maximising ecological enhancements where possible;
 - Residential courtyards designed to include intensive and extensive green and brown roofs and providing space for the community to grow fruit, vegetables and herbs in productive rooftops;
 - Buffering and screening spaces, forming glades between building services yards, meadows and sustainable urban drainage features;
 - Legible spaces that are easy to navigate with logical pedestrian and vehicular routes;
 - Shared surfaces will dominate so pedestrians have priority;

- The proposed podium landform will help contribute to creating spaces of human scale, with seating for informal recreation, breakout space; and
- Maximising play opportunities. The play network will help to connect people linking key active spaces to leisure and work destinations along a network of safe and clearly defined routes.

Figure 14 Illustrative Landscape Masterplan



Play Space, Open Space and Public Realm

Playspace

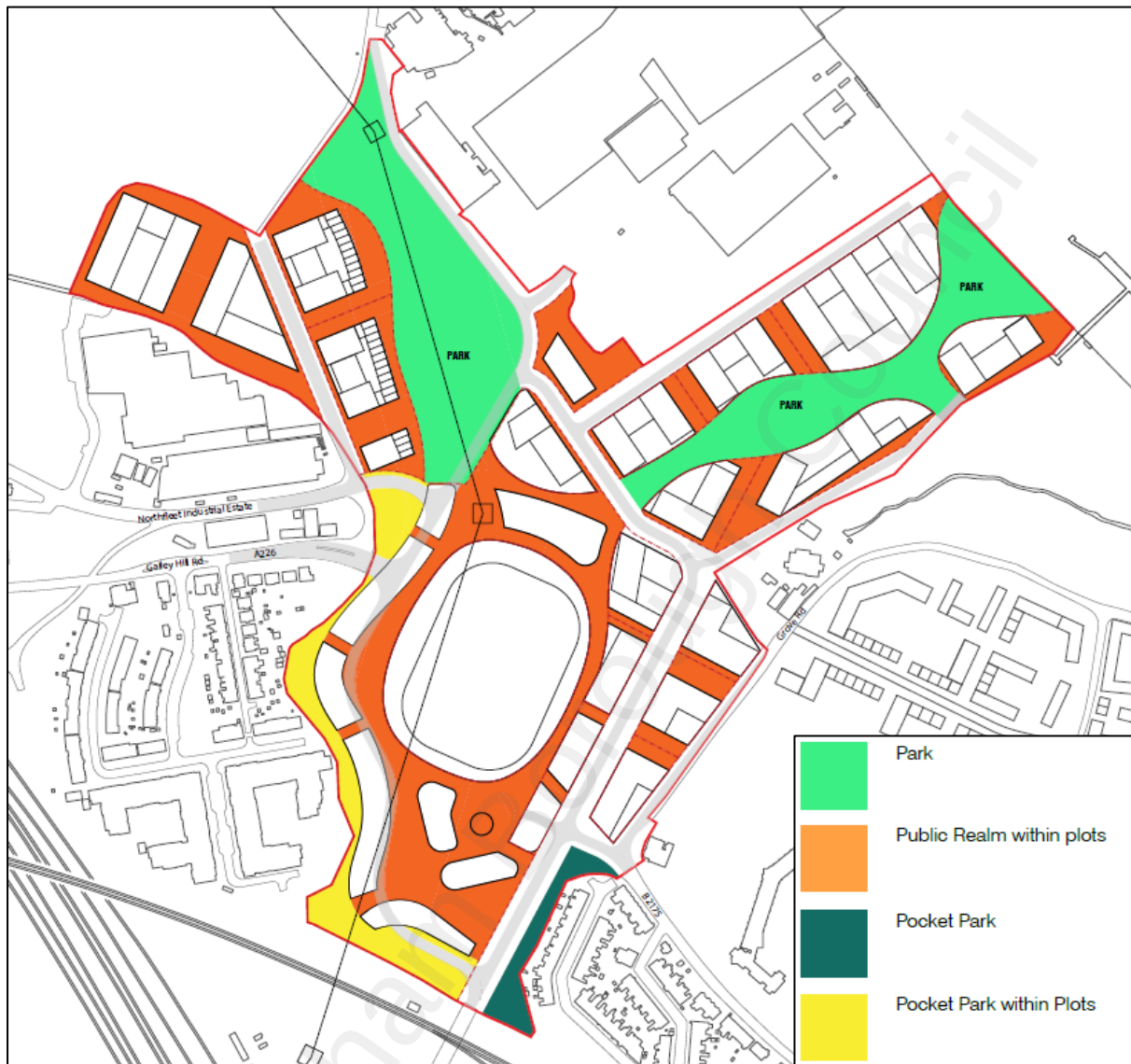
- 93** Based on Gravesham Borough Council policies, the Proposed Development should deliver a minimum requirement of 0.2 hectares of play space across the site. The Parameter Plan Report commits to (as a minimum) achieving this amount of playspace.

Open Space and Public Realm

- 94** The Proposed Development will deliver a minimum of 1.5ha of Parks and Gardens, 5.3ha of Amenity Green Space, and 0.5ha of Allotments across the site. This minimum requirement for open space and

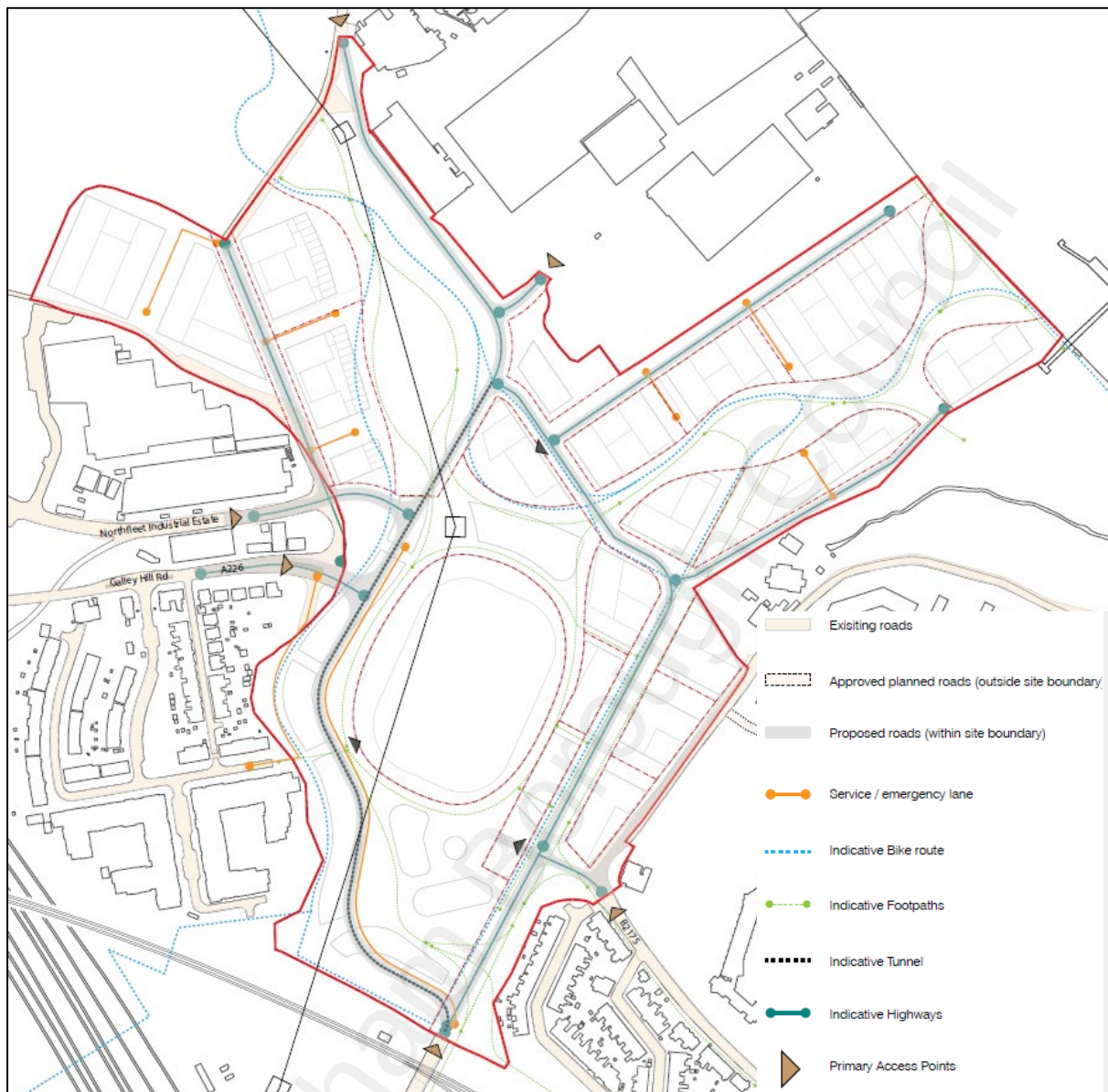
play space is reflected in the Public Realm Parameter Plan (**Figure 15**).

Figure 15 Proposed Development Open Space and Public Realm



Access, Delivery, Servicing and Refuse

- 95 One of the key principles for the design of the Proposed Development is to enhance connections and establish new routes across the site. The Highway Access Parameter Plan (**Figure 16**) illustrates the primary access points to the site (for which detailed approval is sought by the planning application), and indicative pedestrian, cyclist and vehicular routes through the site. This plan illustrates the positioning of routes between building structures, the hierarchy of these routes and how movement and circulation through the site can be achieved.

Figure 16 Proposed Development Highways Access, Movement and Circulation

Car Parking

- 96 A maximum of 2,700 parking spaces will be provided across the site forming the ground and first floor levels of the majority of the development plots. A maximum of 1,750 spaces will be allocated to the residential component of the site. The location of the parking has been divided into the following zones:

- Marketplace parking;
- Stadium parking;
- Riverside parking;
- Boulevard parking; and
- Parkland parking.

Cycle Parking

- 97 Cycle parking and storage cycle parking will be policy compliant as a minimum. A minimum of 3,500

cycle parking spaces will be provided for the residential element of the Proposed Development. The level of cycle parking proposed for the non-residential aspect is presented in **Table 4** below.

Table 4 Non-Residential Cycle Parking

Use Class	Subcategory	Proposed Cycle Provision
A1	Non-food retail	135
A3	Restaurants and Cafes	171
B1	Offices	129
C1	Hotel	144
D2	Stadium	32
E (c,d,e,f)	Non-residential flexible use	50
F2	Local Community Use	48
Total		709

Other Design Considerations and Management Plans

Flood Risk and Drainage Strategy

- 98** The site is predominantly located in Flood Zone 3 which means there is a high probability of flooding. However, the site benefits from flood defences which protect the site against river flooding. The majority of the site is located in a very low surface water flood zone risk, which means that each year this area has a chance of flooding of less than 0.1%. A small portion of the site (where the current Ebbsfleet United Football Stadium is located) has a low risk of surface water flooding, meaning that each year this area has a chance of flooding of between 0.1% and 1%. Small pockets within the site have a high risk of flooding from surface water. High Risk means that these particular areas have a greater than 3.3% chance of flooding each year.
- 99** All Finished Floor Levels of 'more vulnerable' development will be raised 600 mm above the tidal breach flood level for each building. There will be some areas where reception areas and entrances will be required to be located at ground level, below the flood level, however the sensitive areas of these land uses will be raised above the flood levels where appropriate.
- 100** As set out in the Conceptual Drainage Strategy and Design Code, the detailed drainage design will adhere to the following requirements:
- Rainwater Harvesting (RWH) will be used in the residential blocks where feasible;
 - Where green/brown roofs will be provided, RoofBloxx (a type of green roof) or similar attenuation measures will be implemented;
 - Swales will be implemented within Riverside Gardens;
 - Rain Gardens will be implemented where feasible within the Riverside Character Area; and
 - Roof runoff from the Stadium will be directed to shallow tanks beneath the pitch, providing attenuation and water for irrigation.

Energy Strategy

- 101** A Framework Sustainability and Energy Statement has been prepared and submitted in support of the planning application. The Proposed Development energy strategy will be fossil fuel-free, i.e. all electric (for heating and cooling in the first instance). There may be a need for diesel generators to support life safety systems for instance, however this will be determined during the detailed design.

102 The Proposed Development will adopt measures and target performances, where feasible and appropriate. This will include:

- Efficient fabric thermal performance;
- Passive design measures to reduce unwanted solar gains to reduce/omit the need for cooling;
- Natural ventilation where possible; mechanical ventilation with enhanced efficiency and heat recovery elsewhere;
- Provision of energy efficient light fittings;
- Fully electric technology for heating and central hot water systems;
- Use of Central District Heating Systems (where feasible);
- Use of PV's and Heat Pumps to maximise sustainable forms of heating and electricity generation;
- Low/zero carbon heating throughout; and
- Metering and controls.

WASTE

Operational Waste Management

- 103** An Outline Operational Waste Management and Recycling Management Strategy has been prepared and submitted as a technical appendix to the Environmental Statement.
- 104** The principal aim of the strategy has been to demonstrate how sustainable methods for waste and recycling management have been considered for the operational phase of the Proposed Development. Furthermore, with regards to waste and recycling management within the Proposed Development, the strategy has the following aims:
- To contribute towards achieving current and long-term government, regional (Kent County Council), and Gravesham Borough Council targets for waste minimisation, recycling and re-use;
 - To comply with all applicable legal requirements for handling operational waste;
 - To achieve high standards of waste management performance, through giving due consideration to the waste generated during operation of the Proposed Development; and
 - To provide a convenient, clean, and efficient waste management strategy that enhances the operation of the Proposed Development and promotes recycling.
- 105** Given the outline nature of this planning application, detailed information of the Proposed Development including the internal layouts is not available, however, it is proposed that each residential Plot will have its separate bin store, which will be within 30m distance to each residential apartment of that Plot. These bin stores will provide space to hold bins for Mixed Dry Recyclables, Food and Residual waste streams on a weekly collection frequency.
- 106** These bin stores will be located within 10m distance to the Refuse Collection Vehicle stopping point, allowing the council waste operatives to directly access these and transfer them to the Refuse Collection Vehicle for emptying. Once emptied, the council's waste collection operatives will return these empty bins back to the bin stores.
- 107** For the commercial land uses, it is envisioned that bin stores will be provided either combined or separate for different land uses. These bin stores will be designed based on a weekly collection frequency. A private waste collection contractor will be commissioned to collect the waste and recycling material from these different commercial units.
- 108** Due to the outline nature of this planning application, not all information related to the Proposed

Development is available. Therefore, the strategy has been written using the maximum quantum for the land uses, to consider the worst-case scenario. However, it is envisioned that it will be updated and detailed as the design evolves, and other waste management options such as use of automated waste collection systems, and a more frequent waste collection service specific to the commercial land uses will be further explored.

- 109 These provisions will result in waste produced during the operation of the Proposed Development being managed in accordance with the Waste (England and Wales) Regulations, 2011 (as amended).
- 110 The total residual waste arising that the Proposed Development would generate is 31,344m³ per annum. This represents approximately 0.2% when compared to the available landfill capacity, i.e. 15,190,479m³ in the Kent and South London Region. The impacts of this type of waste will therefore be minimal. In addition, the management measures proposed within the strategy will also act as further mitigation to any residual effects (if any) from the Proposed Development. Considering the waste management infrastructure available capacity within the region, the impacts of the waste arising from the Proposed Development will be minimal and will not result in likely significant effects upon waste infrastructure once operational.

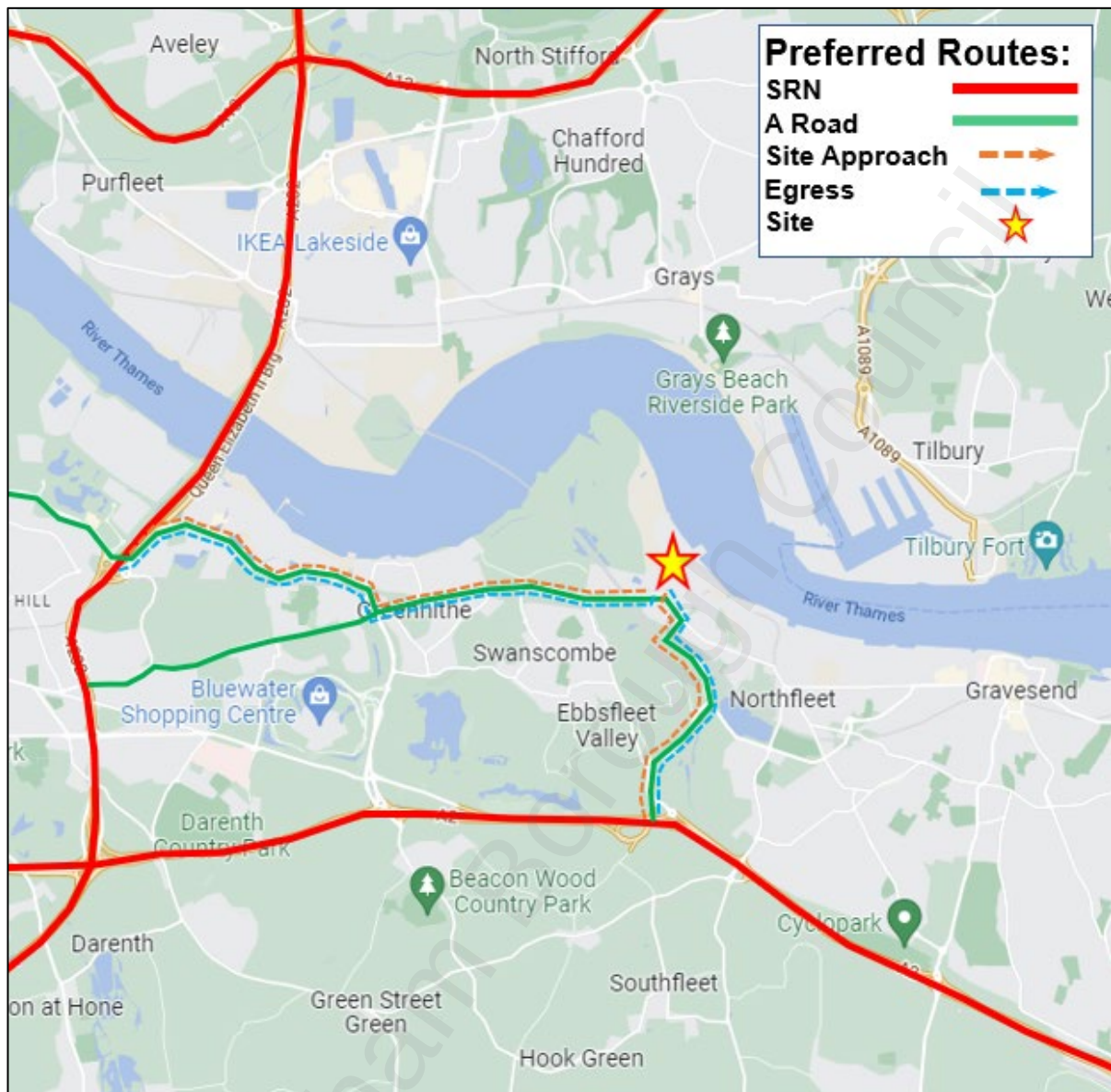
DEMOLITION AND CONSTRUCTION

Anticipated Works and Programme

- 111 The Proposed Development is anticipated to take approximately eight years to build and will be built out in two key phases. Phase 1 (comprising Plots 1, 8, 15-19 and associated improvements to infrastructure and highways) will be completed prior to the start of Phase 2 (Plots 9-14 and further associated open space).
- 112 Following site establishment and the erection of hoardings and temporary construction site offices, the existing building and structures on-site will be demolished, and surveys (for example asbestos surveys) will be undertaken prior to the main construction works starting.

Construction Vehicles

- 113 During the peak construction period (expected to be during month 30 of the construction programme), the peak number of construction vehicles is anticipated to be 214 movements per day. However, the peak daily movements could be up to 20% higher than that for some periods of works during this phase, resulting an approximate total of 128 HGV movements per day (an additional 21 HGVs per day above the average peak).
- 114 With regards to Phase 2, the peak construction is anticipated to be during months 71 and 72 will an average of 144 vehicle movements per day. However, as with Phase 1, the peak daily movements could be up to 20% higher, resulting in an approximate total of 86 HGV movements per day (an additional 14 HGVs per day above the average peak).
- 115 At this stage it is anticipated that construction traffic accessing the site from the north and east will leave the M25 / A282 on to the A2 or A206 Crossways Boulevard. From the south, vehicles will access the site from the A2, joining the A2260 Ebbsfleet Gateway and A226 London Road
- 116 As the construction works progress, in accordance with the wider programme of highways works described further above, the site access points will change to suit the individual plots being brought forward. The likely construction routes within the wider surrounding context are shown on **Figure 17**.

Figure 17 Construction Vehicle Access – Wider Site Context

- 117** To minimise the likelihood of congestion during the construction period, strict monitoring and control of vehicles entering and egressing the site will be implemented. Construction deliveries will be carefully planned with delivery times agreed with each contractor using a booking system. Delivery schedules will be produced in order to look at the profiles of up-and-coming deliveries, consolidate and regulate deliveries and eliminate queuing. Construction traffic routing and operating times will be agreed with the Local Authority.
- 118** Specific time slots will be allocated to the sub-contractors and suppliers for the use of cranes and hoists, to ensure that the main plant will be utilised efficiently, and that deliveries are not queued.

Demolition and Construction Works

- 119** Prior to the start of the enabling and demolition works, discussions with the Local Planning Authority and other relevant consultees will be undertaken in relation to enabling and demolition logistics, as well as site and environmental management.
- 120** A number of management plans will be prepared and agreed with the Local Planning Authority before

the start of any relevant works on-site, to manage the works and minimise disruption to the surrounding area. Specifically, these documents will explain how the works and the site will be managed, including environmental management and will secure the controls and mitigation set out in them.

- 121 The likely construction working hours are:
- 08:00 – 18:00 hours between Monday and Friday;
 - 08:00 – 13:00 hours on Saturdays; and
 - No working on Sundays, Bank or Public Holidays (unless otherwise agreed with the Local Planning Authority).
- 122 All work outside the above listed hours (excluding emergencies) will be subject to the prior agreement of, and / or reasonable notice to the Local Planning Authority.

Community Liaison and Complaints Procedure

- 123 Throughout the course of the demolition and construction of the Proposed Development, the local community (including local residents, businesses and stakeholders) will be kept informed through measures such as public briefings / information sessions and digital consultation. Regular community liaison will provide an opportunity not only for the contractor to disseminate information but also for local residents, businesses and stakeholders to ask questions of the contractor and the Applicant and raise any particular concerns.
- 124 A contact number for the Site Manager will be prominently displayed on site notice boards. This will provide local residents with the ability to communicate directly with the appropriate personnel, allowing any complaints to be logged, fully investigated, and responded to quickly, advising what action has been taken. If necessary, complaints will be reported to the relevant department of the local authority.

ENVIRONMENTAL IMPACT ASSESSMENT

- 125 The following sections of this Non-Technical Summary present a summary of the environmental technical topic assessments that have been undertaken as part of the Environmental Impact Assessment.
- 126 The tables within each section only provide a summary of the likely *significant* effects identified (rather than all effects including those that are not deemed to be significant). Further details on the full assessments can be found within the Environmental Statement (**Volumes 1-3**).

SOCIO-ECONOMICS

- 127 A socio economics assessment has been undertaken to determine the effects relating to employment, displacement of existing on-site users, housing delivery, additional spending, demand for social infrastructure and crime.

Demolition and Construction

- 128 During the demolition and construction of the Proposed Development, the existing businesses and four homes will be displaced from the site, affecting approximately 518 full-time jobs and 10 residents. No permanent loss of employment is anticipated in relation to the football club. During the construction phase, the football club will ground share with another club to fulfil its home fixtures, and it is likely that this will be a local club within the North Kent or South East London area. Temporary displacement of existing businesses during the construction phase is not expected to be a significant effect.
- 129 The construction phase of the Proposed Development would generate employment within the construction industry. It is estimated that there would be an average of approximately 846 direct full-

time equivalent jobs over the duration of the construction period, with an additional 683 indirect full-time equivalent jobs over the duration of the construction period. In addition to this, it has been estimated that the Proposed Development could generate approximately 122 apprenticeship opportunities over the course of the construction period. The impact of construction employment is considered to be beneficial and significant.

Completed Development

- 130** The Proposed Development will provide up to 94,000m² of new non-residential floorspace including retail, food and beverage, local services, sport and recreation, medical/health, creche/nursery, office, hotel and community uses. In addition to a new stadium for Ebbsfleet Football Club (including hospitality and conferencing facilities). Based on this, the Proposed Development is expected to employ 1,508 Gravesham workers (Full-time equivalent) through Direct, Indirect and Induced employment. This will result in a significant beneficial effect (Major Beneficial).
- 131** The Proposed Development will deliver up to 3,500 residential units, based upon the Illustrative Masterplan, this includes provision of 351 shared ownership homes, and 3,149 private units for sale and or rent. This contribution to housing provision is considered to result in a significant beneficial effect (Major Beneficial). In addition, the new housing will have a major beneficial (significant) effect on Council Tax and Non-Domestic Rates Income.
- 132** Growth in the number of homes within the local area will provide a boost to local economy through household spending. This will result in a significant beneficial effect on The Gravesham Economy / Workforce.
- 133** With regards to healthcare, the Proposed Development includes up to 1,500m² for medical/health purposes. The demand for GP Surgery capacity is therefore likely to be met on-site. Furthermore, it is likely that some additional capacity will be available to help address deficits in provision elsewhere within the local area, as such, the resulting effect on primary healthcare provision is expected to be beneficial and significant.

Likely Significant Effects

- 134** **Table 5** summarises the likely significant socio-economic effects of the Proposed Development.

Table 5 Summary of the Likely Significant Residual Socio-Economic Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Demolition and Construction		
Construction Businesses and their Employees	Creation of Employment Opportunities associated with Construction	Major Beneficial
Completed Development (Phase 1 and Phase 2)		
Housing Provision	Change in the provision of housing	Major Beneficial
GBC Council Tax and Non-Domestic Rates Income	Generation of new Council Tax Receipts	Major Beneficial
	Generation of new Non-Domestic Rates Receipts	Moderate Beneficial
The Gravesham Economy / Workforce	Creation of new Permanent Jobs	Major Beneficial
	New Household Expenditure	Moderate Beneficial
Social Infrastructure	Primary Healthcare Availability	Moderate Beneficial

HEALTH

- 135** A Health Impact Assessment has been undertaken. An objective of the Health Impact Assessment is to demonstrate how residual effects (such as those defined within the technical assessments presented within the Environmental Statement and subsequently this Non-Technical Summary) interact with each other to result in effects on determinants of health. Measures have been developed as part of the Proposed Development to promote health and wellbeing throughout the design process.

Demolition and Construction

- 136** As part of the demolition and construction of the Proposed Development, a number of existing businesses and houses will be temporarily displaced as part of the demolition and construction works (refer to the *Socio-Economics* section for further information). However, the temporary displacement of existing businesses during the construction phase is not expected to be significant.
- 137** The Proposed Development will result in adverse health effects in terms of air quality, noise and vibration and neighbourhood amenity (quality of private and public physical external space) as a result of the demolition and construction works. Whilst these effects are considered to be adverse, the health effects are not significant. A number of mitigation measures will be implemented to reduce the impact on sensitive receptors. Similarly there would be a non-significant adverse health effect as a result of resource use and climate change.

Completed Development

- 138** As part of the Proposed Development, a substantial number of residential units will be provided, which results in a significant beneficial effect on human health as a result of the good quality housing design and affordability of residential units provided the Proposed Development.
- 139** In addition to this, the provision of open space and play space and good quality amenity space provided as part of the Proposed Development when considered in combination with the existing provision in the area surrounding the site, will result in a significant beneficial human health effect in relation to access to open space, play space and recreation facilities is anticipated.
- 140** Active travel methods to and from the site will be encouraged as part of the Proposed Development. This is in combination with an increase in accessibility to the site results in a significant beneficial human health effect.
- 141** The Proposed Development will increase the local population, which in turn will place additional pressure on local healthcare services, which are already oversubscribed. To mitigate the adverse impacts, a new on-site healthcare facility will be provided, ensuring the new residents are able to access health locally. It is likely that new provision will exceed the level of demand from new residents, creating additional capacity to benefit existing communities in the local area.

TRAFFIC AND TRANSPORT

- 142 A traffic and transport assessment has been undertaken to determine the effects of the Proposed Development on the local highway network and has considered the local strategic highways works which are assumed to be delivered whilst the Proposed Development is built out, as discussed earlier in this report. The assessment has also considered possible effects relating to severance (being or the feeling of being isolated or separated from something); driver stress; delay for drivers, pedestrians and cyclists; pedestrian and cyclist amenity, fear and intimidation and accidents and safety.

Demolition and Construction

- 143 As a result of the demolition and construction activities associated with the Proposed Development, there will be an increase in the number of vehicles on surrounding roads including the A226 Stonebridge Road and B2175 Stonebridge Road. The peak of construction vehicles accessing the site will occur during month 30 (quarter two of 2026), when approximately 214 construction vehicles will arrive and depart the site each day. The impact on traffic flow is considered to be not significant.
- 144 The detailed Construction Environmental Management Plan will include traffic related measures to be implemented during the construction period, such as designated construction traffic routes and methods that will be adopted to mitigate the effects of traffic associated with the demolition and construction works.
- 145 Given the number of vehicle movements associated with the demolition and construction works, the plan put in place to manage the vehicles, and the capacity of the local highway network, significant effects are not anticipated. At the peak of the construction of the Proposed Development, there will be negligible to minor adverse effects (not significant) on pedestrians and cyclists (in terms of severance, amenity, fear and intimidation) and drivers (in terms of severance, stress, delay to journeys) during the construction of the Proposed Development.

Completed Development

- 146 There are several roads which will experience an increase in traffic as a result of the Proposed Development.
- 147 Following completion of the Proposed Development there will be no significant impacts in relation to severance, delay, amenity, fear and intimidation and accidents and safety.

Likely Significant Effects

- 148 No likely significant traffic and transport effects have been identified as a result of the Proposed Development.

AIR QUALITY

- 149 The assessment undertaken has considered the potential for both the demolition and construction works, and the operation of the Proposed Development, to result in air quality impacts on both existing and introduced receptors. The key considerations of this assessment have been dust emissions and emissions from Heavy Goods Vehicles during demolition and construction, and road traffic emissions once the Proposed Development is completed and operational. The energy strategy for the Proposed Development with regards to heating is all electric; therefore there are no emissions to air as a result of the Proposed Development energy use (e.g. via gas boilers).

Demolition and Construction

- 150 The assessment identified that emissions from construction traffic would be not significant. Construction vehicle movements and deliveries to and from the site will be managed to minimise construction traffic

where possible. In addition, dust management measures will be incorporated into the site's Construction Environmental Management Plan.

- 151 The demolition and construction works have the potential to create dust. During these works, it will therefore be necessary to apply a package of mitigation measures to minimise dust emissions. Appropriate measures have been recommended within the Environmental Statement, with these measures in place, it is expected that any residual effects will be 'not significant'.

Completed Development

- 152 The operation of the Proposed Development is not predicted to result in any significant effects on the existing receptors considered within this assessment in relation to concentrations of nitrogen dioxide and particulate matter. In addition, the assessment demonstrated that air quality for future occupants of the Proposed Development would be acceptable.

Likely Significant Effects

- 153 No likely significant effects on air quality receptors have been identified as a result of the Proposed Development, both during demolition and construction and once the Proposed Development is completed and occupied.

NOISE AND VIBRATION

- 154 The assessment undertaken has considered the potential for the Proposed Development to impact noise and vibration levels at nearby properties and sensitive uses within the site. This includes during the demolition and construction works, as a result of the works themselves and also heavy goods vehicle movements, and once completed and occupied, as a result of changes to road traffic, building services systems and operational noise from the non-residential uses.

Demolition and Construction

- 155 Significant noise effects were identified by the assessment during the demolition and construction works once Phase 1 is complete and fully occupied, during the demolition of Plots 9, 10, 11, 12, 13, and 14, and construction of Plot 14 substructure and road infrastructure. This period represents one of the busiest phases of the construction programme, with the construction programme indicating that these coincident events will take place over approximately 3 months, with reductions in noise expected at other locations. The significant effect occurs at (Phase 1) introduced receptors, specifically Plots 5, 8, 15 and 16. The effect on noise at these introduced receptors is predicted to be temporary and moderate adverse which is significant. Likely effects during the period of demolition and construction works for all other receptors (including all existing receptors) are either negligible (not significant) or minor adverse (not significant).
- 156 The only significant vibration effect identified by the assessment during the demolition and construction phase are on existing sensitive receptors that are within 20m of piling activities, which includes residences on Black Eagle Drive.
- 157 The noise and vibration predictions have been based on reasonable worst-case assumptions and there will be opportunities for the construction contractor to reduce the noise and vibration impact experienced at the nearest noise sensitive receptors. An outline of the potential noise and vibration mitigation measures that will be applied to reduce the noise impact is provided within the Environmental Statement.

Completed Development

- 158 The assessment of changes to the noise environment as a result of the Proposed Development being complete and operational has considered. Changes in road traffic result in no significant effects at identified sensitive receptors.

- 159** Stadium noise has been considered in the assessment with regards to noise from associated with public address systems, noise levels during a football match, and football pedestrian noise emissions. Sensitive receptors (Black Eagle Drive, Wallis Park, Taunton Way, Robinson Way and Railway Street) will experience a negligible (not significant) effect in relation to stadium noise breakout and a minor adverse effect (not significant) in relation to noise associated with noise from football match pedestrians, once mitigation is in place.
- 160** No significant effects on noise levels at nearby sensitive receptors have been predicted once mitigation is in place in relation to commercial noise and building services.
- 161** A site suitability assessment for the Proposed Development has been carried out from a noise perspective, and the site is considered suitable for residential use, given that suitable levels of internal noise can be achieved through the implementation of appropriate glazing.

Likely Significant Effects

- 162** **Table 6** summarises the likely significant residual noise and vibration effects of the Proposed Development.

Table 6 Summary of the Likely Significant Residual Noise and Vibration Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Demolition and Construction		
Introduced Receptors (Phase 1 Plots 5, 8, 15 and 16)	Construction Noise	Moderate Adverse
Black Eagle Drive	Construction Vibration	Moderate Adverse

DAYLIGHT, SUNLIGHT, OVERSHADOWING, SOLAR GLARE AND LIGHT INTRUSION

- 163** The assessment of daylight and sunlight considers the effect of the Proposed Development on the existing levels of daylight and sunlight received by nearby existing residential properties (including 10 - 25 Galley Hill Road, 1-8 and 12-19 Taunton Road, 55-57 Rising Bollards, 1-11 Snowden Hill, 36 and 40-50 Railway Street and properties within the Phoenix Court development).
- 164** The assessment of overshadowing determines the potential for the Proposed Development to cast a shadow on nearby areas of amenity spaces near the site (including amenity space at 10-17 Galley Hill Road, 1-19b Taunton Road, Black Eagle Drive play area and Swanscombe Marshes Site of Special Scientific Interest).
- 165** The solar glare assessment has considered the potential for the Proposed Development to reflect sunlight of nearby road users along the A226 and B2175 and rail users east from Swanscombe Station and northwest from Northfleet Station.
- 166** Light pollution is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from office or commercial buildings onto residential accommodation, where this would cause nuisance to the occupants.

Demolition and Construction

- 167** The impacts of the construction of the Proposed Development will steadily increase as the Proposed Development is built. It is therefore considered that the completed Proposed Development represents the worst-case assessment in terms of likely daylight, sunlight and overshadowing effects. As such, the assessment of these effects focused on when the Proposed Development is complete and operational.

Completed Development

Daylight and Sunlight

- 168** Daylight is the general amount of light (direct and indirect) which enters a room during the daytime. To identify potential effects, a total of 979 windows serving 401 rooms were assessed. The daylight assessment concluded there would be no effect on the majority of windows assessed. 104-151 Phoenix Court would experience significant reductions to daylight levels following the completion of the Proposed Development.
- 169** Sunlight is the direct light from the sun which can be seen / which enters a room. As none of the sensitive receptors have habitable rooms facing within 90 degrees south, the Proposed Development would not result in any changes to sunlight levels.

Overshadowing

- 170** The overshadowing assessment shows that the rear gardens to 1-7 Galley Hill Road and 8-24 Taunton Road and the Black Eagle play space will satisfy the guidelines in relation to overshadowing and hence no noticeable effects are expected as a result of the completed Proposed Development. Swanscombe Marshes Site of Special Scientific Interest will experience small periods of overshadowing, which is expected to be not significant.

Solar Glare

- 171** The solar glare assessment assessed two road viewpoints along the A226 and B2175 and two rail viewpoints; east from Swanscombe Station and northwest from Northfleet station. Overall, for both road and railway viewpoints the Proposed Development is visible within 5 degrees of a road users' line of sight and so there is the potential for significant reflections occurring within a road user or train drivers line of sight. However, with mitigation measures in place such as; orienting the facades to not reflect sunlight at a particular time or place; reducing any large areas of glazing or reflective cladding; introducing fins to minimise reflections from a particular section of the façade; and/or blocking the view of the building in question from receptors such as through planting trees in the line of sight, the overall effect of solar glare is anticipated to be minor adverse (not significant). Further detailed analysis will be undertaken at the Reserved Matters Stage.

Light Intrusion

- 172** Light intrusion effects may occur where sensitive residential or ecological receptors are located in close proximity (approximately 20m or less) to sources of high powered artificial lighting. Given the outline nature of the planning application, the potential for light pollution has been qualitatively considered at the following sensitive receptors; Phoenix Court 104-151, future residential uses internal to the site, Swanscombe Peninsula SSSI and the Riverfront Dock as these receptors are within 20m of the Proposed Development.
- 173** With mitigation measures in place such as ensuring external lighting does not illuminate the sky; ensuring that any external lighting visible from any sensitive receptor is of low intensity; avoiding external lighting which directly illuminates the SSSI and the Riverfront docks in particular; provision of blinds for commercial offices; lighting strategies that reduce the output of luminaires closer to the façades; and light fittings controlled through the use of sensors which switch on and off the light according to office occupancy, the overall effect of light intrusion is anticipated to be not significant (negligible to minor adverse).
- 174** Further detailed analysis will be undertaken at the Reserved Matters Stage.

Likely Significant Effects

- 175 **Table 7** summarises the likely significant daylight, sunlight, overshadowing and solar glare effects of the Proposed Development.

Table 7 Summary of the Likely Significant Residual Daylight, Sunlight, Overshadowing and Solar Glare Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Completed Development		
104-151 Phoenix Court	Reduction to Daylight to existing receptor	Minor to Moderate Adverse

WIND MICROCLIMATE

- 176 Undesirable wind speeds may result in effects to pedestrian comfort and safety at ground level. Therefore, a wind microclimate assessment has been undertaken to determine whether any undesirable wind conditions would be created on-site and in the surrounding area, as a result of the Proposed Development. The assessment considered areas at ground level (specifically at building entrances, pedestrian thoroughfares and within amenity spaces) within the site, at the Proposed Development's balcony and roof terrace levels, around the buildings surrounding the site (including building entrances, thoroughfares and bus stops) and within nearby areas of off-site public open spaces once the Proposed Development is completed.
- 177 The assessment also considered the potential for strong winds to impact upon the safety of cyclists and pedestrians.

Demolition and Construction

- 178 Wind conditions are expected to gradually adjust from those in the baseline scenario (i.e. with the existing building in place) to those expected with the completed Proposed Development.
- 179 It is expected that during the demolition and construction works construction workers will be adequately protected with health and safety measures. Additionally, it is assumed that there will be restricted access (i.e. not accessible to the general public) where demolition and construction works are being undertaken on the site. As such, the likely effect on construction workers is expected to be negligible (not significant).
- 180 At off-site locations throughout the demolition and construction works, wind conditions would gradually adjust to that with the completed Proposed Development in situ, representing a negligible (not significant) effect providing the mitigation measures detailed below are implemented.

Completed Development

- 181 The wind microclimate within and surrounding the site has been closely considered throughout the design evolution process with regards to meeting appropriate comfort and safety criteria for wind conditions.
- 182 Suitable mitigation and control measures have been developed in coordination between the wind microclimate team and the project architects, and will be implemented as part of the detailed design in order to ensure that the wind conditions at the Proposed Development are suitable for the intended uses. Further assessment will also be undertaken at later Reserved Matter Application stage(s) of the detailed scheme to ensure the effectiveness of implemented wind mitigation measures.
- 183 Based upon the parameters tested, including the illustrative landscaping, wind conditions within localised areas of ground level amenity, such as within the Power Park and Riverwalk Gardens would

be one category of wind level higher than desired in the windiest season. Therefore, these areas will require further consideration at the detailed design stage, and this has been ensured through specific mandatory controls captured within the Design Code. Although not tested at this stage, there is substantial scope for effective mitigation at these locations at the detailed design stage, and it is considered straightforward to achieve suitable conditions. Possible solutions could include (noting the below is not an exhaustive list):

- Localised screening immediately adjacent to any seating areas;
- Adjustments to the detailed landscaping scheme to ensure more trees fall within the critical wind flow paths;
- The inclusion of more evergreen trees, or species with higher leaf densities, within the landscaping to provide greater resistance to the wind; and
- Appropriate zoning of the amenity spaces such that “dwell spaces” fall within regions which are suitable for sitting or standing, and any regions which are suitable for walking are specified as transitory zones.

- 184** As noted above, further review and wind testing/assessment will be undertaken where necessary at reserved matters application (RMA) stage(s) in relation to the detailed scheme that will ultimately come forward, and as part of this, verification of the effectiveness of any wind mitigation measures required. The assessment of appropriate wind microclimate mitigation measures at the detailed design stage by an experienced wind engineer, if required, should be secured through an appropriately worded planning condition

Likely Significant Effects

- 185** **Table 8** summarises the likely significant wind microclimate effects of the Proposed Development. Windier than suitable conditions and significant effects identified within the Proposed Development would require mitigation through wind testing of the detailed design during the Reserved Matter Application stage(s). Mitigation will be implemented as part of the detailed design to ensure these areas are also suitable for their intended use in all seasons.

Table 8 Summary of the Likely Significant Residual Wind Microclimate Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Completed Development		
On-site pedestrian users and occupiers	Ground Level Amenity (Power Park and Riverwalk Gardens)	Negligible to Minor Adverse ¹¹

ARCHAEOLOGY

- 186** An archaeology assessment has been undertaken which examines the potential impact and likely effects of the Proposed Development on buried heritage assets within the site. Features of archaeological interest on site comprise of palaeolithic deposits, palaeoenvironmental remains, Stonebridge Foundations (post-medieval), Possible Mill Pond (modern), 19th Century Windmill Foundations (modern) and infrastructure and remains associated with Portland Cement Works (modern). These are parts of the historic environment which are considered to be important. As well as below ground (buried heritage) Aspin's Kiln Scheduled Ancient Monument has also been considered within the archaeology chapter and Built Heritage Assessment.
- 187** An archaeological desk-based assessment and a search of pre-existing archaeological records were

¹¹ Note, minor adverse effects are considered 'significant' in the wind microclimate assessment.

combined to provide relevant information for a robust archaeological assessment of the site and surrounding area.

Demolition and Construction

- 188 The archaeological assessment has considered the potential effects resulting from the demolition and construction of the Proposed Development on buried archaeological remains.
- 189 Impacts to buried archaeological remains that may be present underneath the site are limited to the demolition and construction phase works. Resulting effects will be permanent and would extend across the area of the site where excavation works occurs and where archaeology remains are present. These effects may be mitigated by a programme of archaeological site investigations, prior to below ground demolition or construction works taking place.
- 190 The effect to the potential remains of the Cement Works, kilns, structures and tunnel networks were identified as a moderate adverse effect prior to mitigation. With the implementation of preservation by record, through archaeological trial trenching and any subsequent investigation and recording that may be required, it is anticipated that this would be reduced to a minor adverse effect which is not significant.
- 191 Ground disturbance from the pile probing during demolition and the construction of piled foundations may heavily truncate or remove entirely any archaeological remains within the area affected. Since archaeological remains (including palaeolithic deposits, palaeoenvironmental remains and Post Medieval Stone Bridge Foundations) may be present within the site, a mitigation strategy of archaeological trial trenching and geoarchaeological test pit evaluations has been suggested by Kent County Council.
- 192 The residual effects in relation to all identified receptors are anticipated to be not significant.

Completed Development

- 193 Following construction of the Proposed Development, no further ground disturbance would occur as a result of the completed and operational Development, and therefore no resulting effects upon buried heritage assets are anticipated.

Likely Significant Effects

- 194 No likely significant effects on archaeological receptors have been identified as a result of the Proposed Development, both during demolition and construction and once the Proposed Development is completed and occupied.

ECOLOGY AND BIODIVERSITY

- 195 An ecology assessment of potential demolition and construction effects as well as any effects once the Proposed Development is completed and operational has considered ecological receptors including sensitive sites in the surrounding area (including both national and internationally designated sites) which may be affected by increased recreational pressures and changes in water nutrient levels. An extended Phase 1 Habitat survey was undertaken in May 2022 to determine the existing habitats on site. Following this survey, a further Preliminary Bat Roost Assessment was undertaken on the trees and building presents on-site and further bird surveys were undertaken. The breeding bird surveys were undertaken as there are areas of habitat on-site and surrounding the site which could support protected breeding birds.
- 196 Swanscombe Peninsula Site of Special Scientific Interest (SSSI) borders the site to the northwest. This site was granted SSSI status in November 2021 and has been designated in recognition of its national importance for plants, geology, birds and invertebrates.

Demolition and Construction

- 197** The risk of damage and pollution to habitats and species during the demolition and construction works will be managed through a Construction Environmental Management Plan (CEMP) which will be implemented during these works. This will include details on pollution prevention measures such as safe storage of materials, fencing off of any off-site habitats and minimising dust off-site. It will also include measures to reduce light spill to areas that may be used by bats, and will include checks for nesting birds prior to any vegetation removal, where it is not possible for these works to be undertaken outside of the bird nesting season.
- 198** Further to this, pre-construction black redstart surveys will be undertaken to determine appropriate levels of mitigation. These should be undertaken in the key breeding season (March to August inclusive) to confirm if black redstart are nesting directly on the site or not.
- 199** Winter bird surveys will be undertaken in the winter of 2022-2023 which will determine the use of the mudflats by overwintering birds and will inform the mitigation needed during winter.
- 200** Assuming the presence of overwintering birds, visual and noise barriers will be used to prevent disturbance to the birds on the mudflats to the north and east of the site on the south bank of the River Thames and at Robin's Creek during the breeding season, as detailed above, when works cannot be phased outside of this time period. Visual and noise barriers in winter along the mudflats will be used if determined by the 2022-2023 winter bird surveys.
- 201** Soft starts¹² and other methods such as the use of low impact machinery to limit noise and vibration disturbance will be used for noisy works such as piling if undertaken during the breeding season and will be detailed in the CEMP.
- 202** With the implementation of these measures within the CEMP, the potential effects on all ecological receptors is considered to be Negligible (not significant) during the demolition and construction stages of the Proposed Development.

Completed Development

- 203** In order to manage the footfall and reduce impacts from recreational pressure from the site to the Swanscombe Peninsula, which is a designated ecological site, a number of mitigation measures have been embedded in the design of the Proposed Development:
- The provision of adequate minimum on-site open space for operational amenity. The quality of the amenity and open space on-site has also been designed in coordination to ensure that it can be suitable for use, and therefore not require users and occupants of the Proposed Development to actively seek off-site amenity and open spaces - for example, the wind microclimate assessment has included relevant landscaping measures to ensure the Pocket Park areas a suitable for use with regards to wind comfort;
 - Controlled pedestrian access and signposting displaying the sensitivity of Swanscombe Peninsula to human disturbance, for example highlighting the potential detrimental impacts of dogs off leads upon nesting birds during the relevant ecological season;
 - Access should be managed to the Swanscombe Peninsula; for example, fences should be erected at the site boundary to reduce pedestrian footfall to the north-west of the site;
 - No footpaths to be created between site and Swanscombe Peninsula (only one previous footpath to remain);

¹² This is a process in which the existing buildings are taken back to construction materials including the removal of windows and door frames

- The provision of an information centre/cafe within the Power Park, next to the play areas, to encourage walks around the site as opposed to within the Swanscombe Peninsula, and to provide information regarding notable species and habitats including relevant protection measures within the local area and the SSSI in particular; and
- Boundary of trees between SSSI and site to provide barrier rather than continuation of the SSSI into the site.

- 204** Furthermore, an audit to monitor the recreational usage from the Proposed Development on the SSSI will be undertaken. This will identify the effect threshold or the point at which wildlife begins to be disturbed by recreational activities to provide informed recommendations to key stakeholders regarding infrastructure construction and visitor management. This will inform future phases of this Proposed Development on the most appropriate and proportionate mitigation requirements to reduce impacts on the SSSI if a threshold is reached.
- 205** It is considered with the implementation of the above embedded mitigation measures and the additional measures of an audit, the residual effect of increased footfall / recreational pressure on the Swanscombe Peninsula SSSI would be negligible (not significant).
- 206** Once detailed design is available for the Proposed Development, Kent Wildlife Trust and NE will be consulted to discuss potential further mitigation measures (if required and relevant) to be incorporated into the detailed design of the Proposed Development.
- 207** Due to the site's proximity to mudflat habitat, effects on the nearby mudflat Priority Habitats¹³ could arise because of an increase of pollution incidences such as dust arisings, noise, night lighting, vibration, and surface water/pollution run-off as a result of the completed Proposed Development. This could result in the Priority Habitats becoming degraded. The main impact which would likely cause habitat degradation would be through drainage into the Thames, resulting in a minor adverse (not significant) effect. However, with mitigation measures such as a Biodiversity Enhancement and Management Plan, education to the public and installation of bird and bat boxes in place, this would result in a negligible (not significant) effect.

Likely Significant Effects

- 208** No likely significant effects on ecological receptors have been identified as a result of the Proposed Development, both during demolition and construction and once the Proposed Development is completed and occupied.

WATER RESOURCES, FLOOD RISK, DRAINAGE AND GROUND CONDITIONS

- 209** The water resources, flood risk, drainage and ground conditions assessment has considered the impacts on multiple receptors, including human health; controlled waters; and buried services and infrastructure during the demolition and construction and completion of the Proposed Development.

Demolition and Construction

- 210** Demolition and construction works have the potential to result in significant effects on the human health of on and off-site users and construction workers, who come into contact with contaminated soils, unexploded ordnances, or groundwater. The demolition and construction phase also has the potential to result in effects to groundwater through contamination. However, with the implementation of

¹³ *Priority Habitats are a range of semi-natural habitat types that were identified as being the most threatened and requiring conservation action.*

appropriate mitigation measures including; a Construction Environmental Management Plan; comprehensive intrusive investigation to verify contamination conditions on site; a UXO Survey being undertaken prior to excavation work; and ground gas monitoring which will be undertaken prior to the demolition and construction. All effects associated with the demolition and construction phase are assessed as not significant.

Completed Development

- 211** Once the Proposed Development has been constructed, all necessary mitigation including any required remediation would have been undertaken. Were contamination to remain on-site there could be the potential for future site users, adjacent site users and maintenance workers to come into contact with contaminated soil or groundwater, therefore negatively affecting human health. However, all areas of contamination on-site will be remediated in line with a remediation method statement and the results will be verified to ensure the site no longer represents a risk, and as such the completed development has been assessed as not significant.
- 212** With regards to water resources, the site is predominantly located in Flood Zone 3 which means there is a high probability of flooding although the land has been assessed as having a less than 1 in 100 (1%) annual probability of river or sea flooding. In addition, the site benefits from flood defences which protect the site against river flooding. The majority of the site is located in a very low surface water flood zone risk, which means that each year this area has a chance of flooding of less than 0.1%. A small portion of the site (where the current Ebbsfleet United Football Stadium is located) has a low risk of surface water flooding, meaning that each year this area has a chance of flooding of between 0.1% and 1%. Small pockets within the site have a high risk of flooding from surface water. High Risk means that these particular areas have a greater than 3.3% chance of flooding each year.
- 213** The buildings of the Proposed Development, including the structural support of any buildings/structures along the northern boundary, will be set back more than 16m from the River Thames defences and the Robin's Creek defences and structural supports for buildings and structures will be completely separate of any river wall supports. This provides an appropriate easement that is free from buildings to allow for access and maintenance to the existing flood defences adjoining the River Thames¹⁴ and Robin's Creek. Furthermore, as captured within the Design Code, the Proposed Development will include the provision of an appropriate flood defence on-site which meets the Thames Estuary 2100 (TE2100) standards.
- 214** With regards to water resources, the River Ebbsfleet is a culverted watercourse that flows through the site along the eastern boundary. The exact alignment of the culvert is currently unknown due to the lack of information and documentation, coupled with the inaccessibility of the area in question. Therefore, the Applicant has committed to a detailed culvert survey being undertaken at reserved matters stage (controlled by a suitably worded planning condition). An indicative resolution with regards to the on-site culvert has also been proposed which includes the diversion of the culvert along the road to the west of the site. The realignment details would be confirmed following a detailed survey of the culvert to understand its depth, width and conditions and this would stipulate any realignment route. This approach would provide a betterment when compared to the existing scenario as there will be opportunities to widen the culvert, increasing its capacity thereby reducing flood risk.
- 215** All Finished Floor Levels of 'more vulnerable' development will be raised 600 mm above the tidal breach flood level for each building. There will be some areas where reception areas and entrances will be required to be located at ground level, below the flood level, however the sensitive areas of these land uses will be raised above the flood levels where appropriate.

¹⁴ It should be noted that the existing river wall adjoining the River Thames is not within the site redline planning application boundary.

- 216 The detailed drainage design will adhere to the following requirements:
- Rainwater Harvesting (RWH) will be used in the residential blocks (where feasible);
 - Where green/brown roofs are provided, RoofBloxx (a type of green roof) or similar attenuation measures will be implemented;
 - Swales will be implemented within Riverside Gardens;
 - Rain Gardens will be implemented where feasible within the Riverside Character Area; and
 - Roof runoff from the Stadium will be directed to shallow tanks beneath the pitch, providing attenuation and water for irrigation.
- 217 By providing water quality treatment to the surface water runoff, there will be a minor beneficial (significant) effect to surface water in relation to accidental releases.

Likely Significant Effects

- 218 **Table 9** summarises the likely significant ecology and biodiversity effects of the Proposed Development.

Table 9 Summary of the Likely Significant Residual Ground Condition Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Completed Development		
Surface Water	Water quality treatment to the surface water runoff	Negligible to Minor Beneficial

TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

- 219 An assessment of the effects of the Proposed Development on key views into and across the site and in the context of the existing townscape setting, has been undertaken.
- 220 A total of six 'Townscape Character Areas' (geographical areas which are based on the dominant land use, building types, traffic and pedestrian movement, levels of activity and townscape quality) were considered to assess the range of ways the Proposed Development may affect the existing character and quality of the surrounding townscape, as shown in **Figure 18**.
- 221 The visual assessment has considered the makeup and character of views likely to be experienced by people within the surrounding area. An assessment of the local visual context and visual amenity was undertaken to understand the existing extent of visibility of the site, views in the vicinity of the site and visual receptors likely to be affected by the Proposed Development. A total of 16 views were considered (in agreement with Gravesham Borough Council) to assess how the Proposed Development may affect the existing character and quality of the surrounding townscape, see **Figure 19**.

Demolition and Construction

- 222 Activities during the demolition and construction of the Proposed Development, including transport of heavy machinery to and from the site, excavation and construction of foundations, scaffolding and cranes, have the potential to result in townscape and visual effects. This will result in increased noise, vibration, dust and traffic in the surrounding area. The magnitude of this impact will, result in an adverse impact to Townscape Character Areas and a number of assessed viewpoints, however these effects will not be significant. Plans such as a Construction Environmental Management Plan will be put in place during the demolition and construction works to minimise any impacts. It is noted that effects at the demolition and construction stage are temporary as the scheme progresses towards that of the completed Proposed Development.

Figure 18 Townscape Character Areas

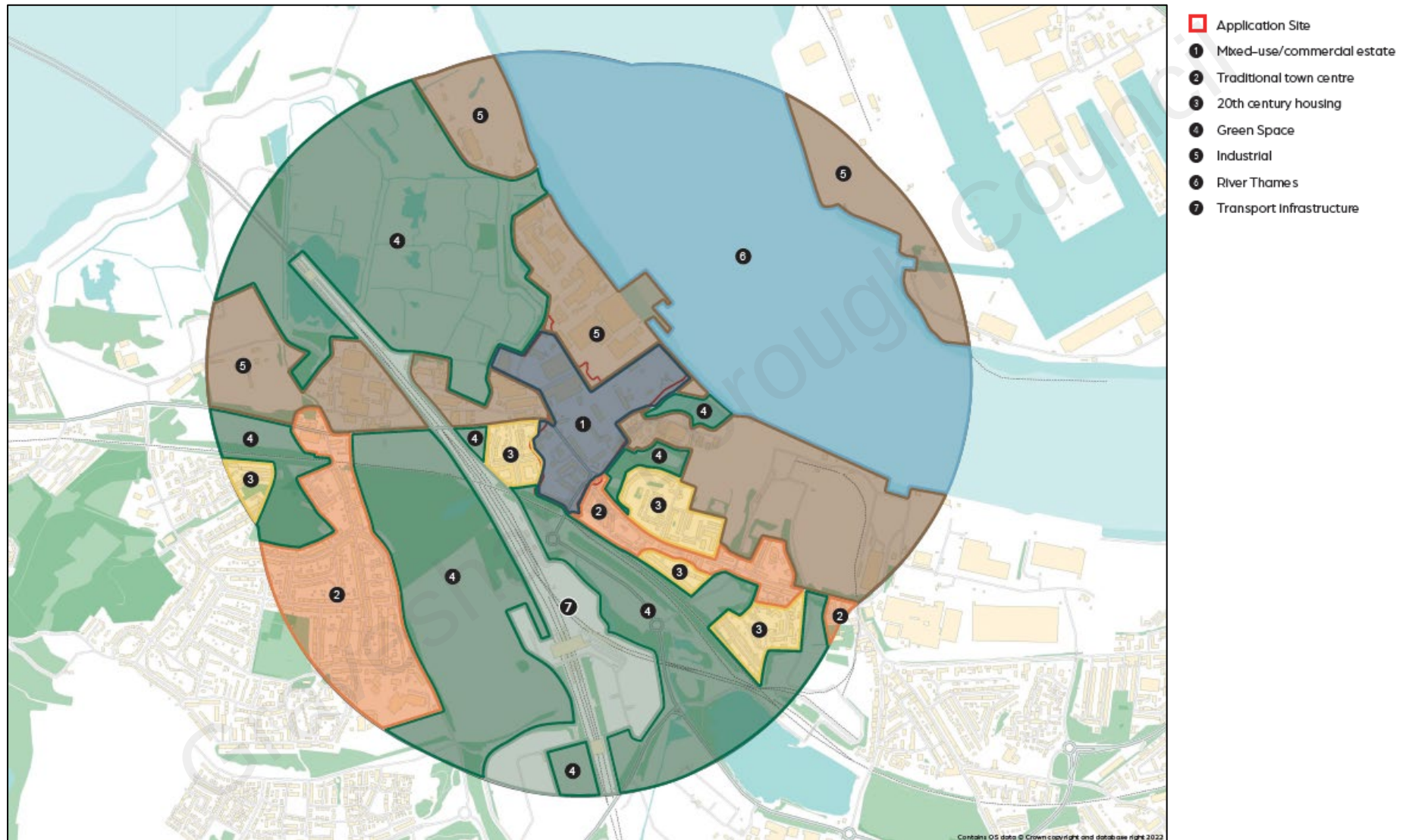
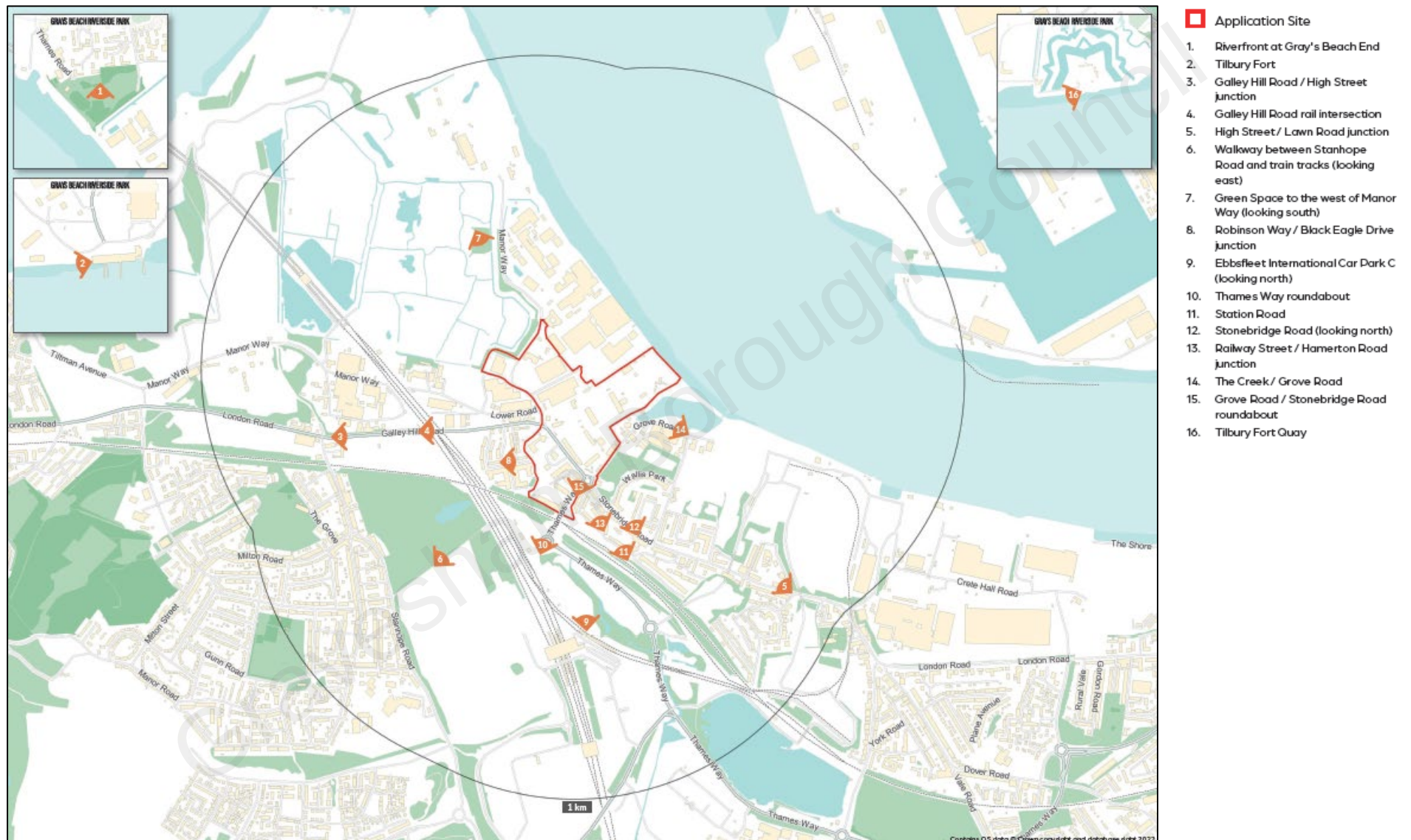


Figure 19 View Location Map



Completed Development

- 223** Once the Proposed Development is complete, there would be an improvement and enhancement to the character, appearance and function of the surrounding townscape; notably there would be a significant beneficial effect on Townscape Character Areas 1 and 5 as a result of the completion of the Proposed Development. The remaining Townscape Character Areas would not experience significant effects.
- 224** The Proposed Development will improve and enhance a number of views upon the completion of the Proposed Development, resulting in significant beneficial effects on Views 14 and 15 (moderate beneficial). The remaining views would not experience significant effects.

Likely Significant Effects

- 225** **Table 10** summarises the likely significant townscape and visual impact effects of the Proposed Development.

Table 10 Summary of the Likely Significant Residual Townscape and Visual Impact Effects

Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Completed Development		
Townscape Character Area 1 and 5	Change in setting of the townscape character area	Moderate Beneficial
Views 14 and 15	Effect of the completed Proposed Development on views	Moderate Beneficial

CLIMATE CHANGE

The Impact of Climate Change on the Proposed Development

- 226** Climate change has the potential to alter the current environment. To consider how the environmental and socio-economic effects of the Proposed Development might change under a different climate in the future, a future climate scenario has been developed using projections published by the Met Office. The projections consider the local climate effects arising from a series of different greenhouse gas emission scenarios (and the associated impacts to the climate).
- 227** As a result of climate change, several different environmental factors are likely to vary in the future. These include increase in average air temperatures, increase in yearly rainfall and sea level rise. Additionally, cloud cover could slightly decrease.
- 228** Each technical topic assessment has reviewed the possible implications of a different climate in the future against the results and conclusions of impact assessment of the Proposed Development. They confirm that likely effects identified for the technical topics are not expected to change as a result of climate change, as presented in the Climate Change Vulnerability Assessment.

The Impact of the Proposed Development on Climate Change

- 229** Greenhouse gases are gases in the atmosphere which have the potential to increase air temperatures and contribute to climate change. A greenhouse gas emissions assessment has been undertaken to assess the potential greenhouse gas emissions from the construction and operation of the Proposed Development.
- 230** The GHG assessment has identified that the Proposed Development will lead to greenhouse gas emissions, however these are described as Negligible (not significant).

- 231** This conclusion is based on the greenhouse gas emissions generated by the Proposed Development being small in the context of greenhouse gas budgets, the Proposed Development being compliant with all relevant policies relating to greenhouse gas and climate change, and the fact that the Proposed Development will not conflict with or prevent the UK meeting its net zero GHG emissions target of 2050.
- 232** Mitigation is provided to avoid and reduce the greenhouse gas emissions, which follows the key principles of greenhouse gas mitigation in best practice guidance and is consistent with the requirements of relevant policy.

CUMULATIVE EFFECTS ASSESSMENT

- 233** A number of other developments within the surrounding area have been considered in order to understand if there is a combined or 'cumulative' effect associated with the Proposed Development and these other developments. As requested by the Local Planning Authority, the environmental assessments also monitor the status of a number of local major site planning applications and decisions which have not yet been submitted for approval, or have been recently withdrawn with the intention to resubmit a planning application in the near future, and are at varying stages in the pre-application stage, given the extensive duration of construction of the Proposed Development. As such, a two-stage cumulative scheme assessment has been undertaken to identify potential cumulative effects.
- 234** Two groups of developments or 'tiers' have been assessed within the cumulative effects assessment as shown in **Figure 20**:
- **Tier 1:** Proposed Development + relevant surrounding developments with planning applications that have been submitted to or approved by the Local Planning Authority; and
 - **Tier 2:** Proposed Development + relevant surrounding developments with planning applications that have been submitted to or approved by the Local Planning Authority + a number of major site planning applications which have not yet been submitted for approval.
- 235** Generally, the 'Tier 1' cumulative schemes that are included within the cumulative effects assessment fall under one (or more) of the following criteria:
- Schemes that will produce an uplift of more than 10,000m² (Gross External Area (GEA) of mixed-use floorspace), or any office to residential conversions (granted under the General Permitted Development Order) giving rise to more than 150 residential units, whereby they:
 - have full planning permission, a resolution to grant permission; OR
 - have been submitted (but not yet permitted), where considered appropriate.
- 236** Schemes that are directly adjacent to the site are also considered on a site-by-site basis. Where a site is subject to more than one permission, the most recent application is assessed.
- 237** 'Tier 2' cumulative schemes are defined (for the purposes of assessment) as relevant major local schemes which have the potential to result in significant in-combination effects when considered alongside the Proposed Development. Tier 2 schemes considered by having predominantly been informed by consultation (e.g. via the EIA scoping process), and are at varying pre-application stages, or are schemes previously submitted for approval and subsequently withdrawn, but where it is known that there is a future aspiration to submit a planning application for a similar development.

Likely Significant Cumulative Effects

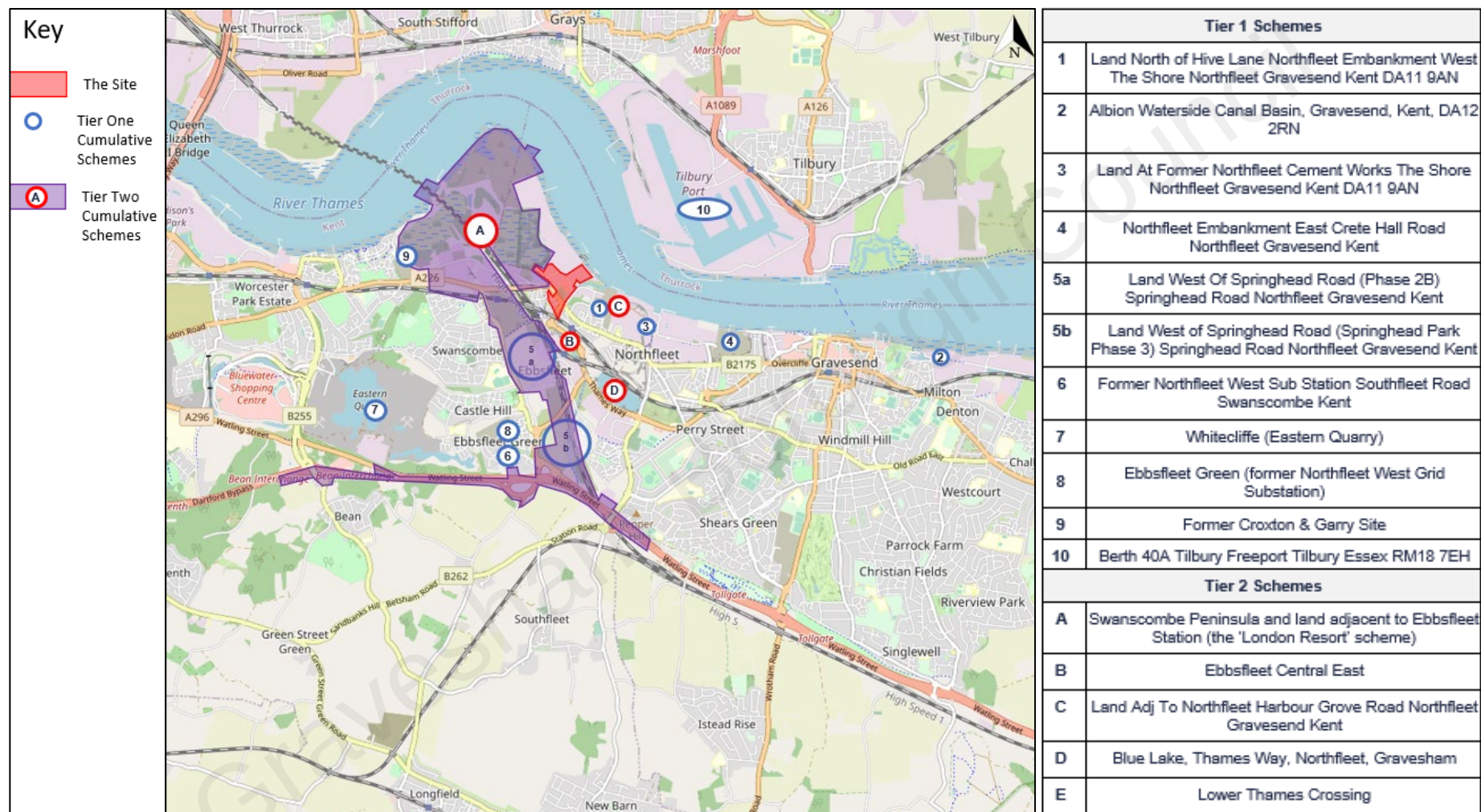
- 238** The EIA process has identified likely significant cumulative effects additional to the main assessment of the Proposed Development, as well as changes to significant effects already identified, as a result of the Proposed Development coming forward in conjunction with other surrounding cumulative schemes once the Proposed Development is complete and operational.

- 239** No likely significant cumulative effects have been identified with regards to the demolition and construction of the Proposed Development.

Complete and Operational

- 240** Potential cumulative adverse impacts resulting from the Proposed Development in combination with cumulative schemes include increased footfall, recreational pressures, pollution, and habitat degradation at the Swanscombe Peninsula Site of Special Scientific Interest (SSSI).
- 241** At this stage, prior to detailed design, the most likely issue is considered to be the potential for cumulative effects associated with the overall increase in the population and visitor numbers at the Swanscombe Peninsula SSSI and the potential impact this may have upon habitats and species. The London Resort Tier 2 scheme would result in a significant increase in the number of people visiting this part of North Kent, in addition to an increased local population due to construction workers and operations staff. Therefore, at this stage, for caution, cumulative effects are considered to be significant (moderate adverse).
- 242** However, the London Resort Tier 2 cumulative scheme would be required to follow policy requirements relating to mitigation measures for pollution control, habitat degradation and recreational pressures. Kent Wildlife Trust and Natural England will be consulted to discuss any potential further mitigation measures (as required and relevant) to be incorporated into the detailed design of the Proposed Development to further mitigate adverse impacts upon the SSSI arising from recreational pressures. This may form specific on-site detailed landscaping measures or off-site financial contributions to aid management/maintenance of the SSSI, however this will be discussed and agreed. Therefore, if these measures are adhered to and approved, in coordination with the relevant statutory bodies (Kent County Council and Natural England), the cumulative effects could be reduced to not significant.
- 243** When considering the London Resort scheme in combination with the Proposed Development, with regards to townscape, there would be a higher magnitude of effect upon Townscape Character Area 1, resulting in an overall Major Beneficial (Significant) effect.
- 244** Furthermore, the London Resort scheme covers large swathes of Townscape Character Area 4: Green Space, which generally comprises green space. The quality of this space varies across the character area and has been significantly changed following the arrival of the Ebbsfleet International Station. The proposals for the London Resort scheme are not subject to a valid planning application and so the details are not yet fully understood, thus therefore it is not possible to provide a definitive assessment of the cumulative impact. However, subject to the retention of the protected nature reserves, the proposals have the potential to result in a cumulative Moderate Beneficial (Significant) effect upon Townscape Character Area 4.

Figure 20 **Surrounding Developments / Cumulative Schemes**



Note, the Lower Thames Crossing scheme (Tier 2 cumulative scheme E) is located approximately 6km east of the site at its closest point, and is not visible on this figure.

EFFECT INTERACTIONS

- 245** Effect interactions occur because of interactions between multiple individual effects associated with just one project on a single receptor i.e., the combination of individual effects, for example effects in relation to noise, dust and traffic on a single receptor.
- 246** There is likely to be a **significant** effect interaction at Black Eagle Drive during the demolition and construction activities associated with Phase 1 of the Proposed Development, from alterations to the existing levels of noise and construction vibration associated with construction works. The effect interactions are deemed significant as at least one of the effects (construction vibration) is significant in isolation. However, adverse effects are only likely to occur if piling activities are taking place in close proximity to sensitive receptors. In reality, high vibration generating activities are unlikely to occur so close to sensitive receptors as detailed planning methodology (i.e. Piling Method Statement) and solutions will further reduce the potential for adverse impacts, and if they do, they would be of short-term duration and appropriately monitored. It is considered that, with the appropriate and successful implementation of the mitigation proposed, the likely adverse effects predicted would reduce.
- 247** There is also likely to be a **significant** effect interaction at introduced residential receptors Plots 5, 8, 15 and 16 during the demolition and construction activities associated with Phase 2 of the Proposed Development, from alterations to the existing levels of noise and construction vibration associated with construction works. The effect interactions are deemed significant as at least one of the effects (construction noise) is significant in isolation. Whilst the effects have the potential to interact, the interaction of these effects is not unusual for construction works. All reasonable steps will be taken to mitigate and minimise the effects through the adoption of Best Practicable Means (noise mitigation measures and noise management) to ensure that noise is minimised at all times. It is not uncommon for construction works to be undertaken near introduced sensitive uses on a phased, large-scale development of this nature, and the potential for temporary short-term adverse effects on introduced receptors is expected and will be managed as far as reasonably possible.
- 248** There is likely to be a **significant** effect interaction at Phoenix Court 104-151 resulting light pollution and alterations to daylight levels once the Proposed Development is completed and operational. The effect interactions are deemed significant as at least one of the effects (alterations in daylight) is significant in isolation.
- 249** With regards to the assessment of potential daylight effects, the assessment is based on the maximum massing parameters of the Proposed Development in order to represent a worst-case for assessment. Owing to the low-rise nature of the existing site conditions, alterations of this magnitude with regards to the Proposed Development are to be expected. The availability of daylight to existing residential receptors will continue to be an important consideration at RMA stage.
- 250** With regards to light intrusion, until further information on an emerging detailed scheme is available, the practicality of the measures is not yet known, and so residual light intrusion effects are based on a worst-case qualitative assessment. In order to minimise any potential light intrusion effects from the commercial office elements upon residential receptors, potential for light intrusion will be considered throughout the detailed design process and potential effects will be mitigated through the below measures to ensure that effects are reduced:
- Ensuring that any external lighting, such as the stadium, does not directly illuminate the sky;
 - Ensuring that any external lighting visible from any sensitive receptor is of low intensity;
 - Avoiding external lighting which directly illuminates the SSSI and the Riverfront docks in particular;
 - Provision of blinds for commercial offices;

- Lighting strategies that reduce the output of luminaires closer to the façades; and
- Light fittings controlled through the use of sensors which switch on and off the light according to office occupancy.

251 The details of any mitigation and its efficacy will be guided by ILP Guidance notes (2021) and presented and reported upon where relevant at reserved matters stage.

SUMMARY OF LIKELY SIGNIFICANT EFFECTS AND CONCLUSIONS

252 The redevelopment of the site will provide a new mixed-used residential-led development within Gravesham Borough Council which will significantly contribute to the wider regeneration of the area and positively contribute to housing supply within the Council and wider area.

253 During demolition and construction, short-term significant effects have been identified in relation to noise and vibration, socio-economics, health and townscape and visual impact.

254 During operation permanent beneficial effects have been identified in relation to socio-economics, health and townscape and visual impact. Permanent adverse effects have been identified in relation to daylight and sunlight and wind microclimate.

255 **Table 11** and **Table 12** summarise the likely significant effects (i.e. significant residual effects following mitigation) associated with the Proposed Development:

Table 11 Summary of Likely Significant Effects of the Demolition and Construction Works Proposed Development

Topic	Receptor	Description of Significant Effect	Scale and Nature of Residual Effect
Demolition and Construction			
Assessment Scenario 1 (Phase 1 demolition and construction)			
Socio-Economics	Construction Employment (Businesses and their Employees)	Employment generation during the period of demolition and construction	Moderate Beneficial
Vibration	Black Eagle Drive	Construction Vibration	Moderate Adverse
Assessment Scenario 2 (Phase 2 demolition and construction)			
Noise	Plots 5, 8, 15 and 16	Construction Noise	Moderate Adverse
Socio-Economics	The socio-economic assessment considered a single demolition and construction scenario. Therefore, all socio-economic effects for Assessment Scenario 2 are the same as those outlined in Assessment Scenario 1 above. No additional likely significant effects are identified.		

Table 12 Summary of Likely Significant Effects of the Complete and Operational Proposed Development

Topic	Receptor (s)	Description of Residual Effect	Classification of Residual Effect
Socio-Economics	Housing Need / Availability in Gravesham	Provision of housing for the GBC Housing Supply Pipeline	Major Beneficial
	GBC Council Tax and Non-Domestic Rates Income	Generation of new Council Tax Receipts	Major Beneficial
		Generation of new Non-Domestic Rates Receipts	Moderate Beneficial
	The Gravesham Economy / Workforce	Creation of new Permanent Jobs	Major Beneficial
		New Household Expenditure	Moderate Beneficial
	Social Infrastructure	Primary Healthcare Availability	Moderate Beneficial

Topic	Receptor (s)	Description of Residual Effect	Classification of Residual Effect
Water Resources	Surface Waters	Water quality treatment to the surface water runoff	Negligible to Minor Beneficial
Wind Microclimate	On-site Pedestrian Users and Occupants	Wind conditions at ground level amenity spaces	Negligible – Minor Adverse
Daylight	Phoenix Court 104-151	Reduction to daylight to existing receptor	Minor Adverse – Moderate Adverse
Townscape	TCA1: Mixed-use/commercial estate TCA5: Industrial	Changes to the townscape characteristics due to the completed Proposed Development	Moderate Beneficial
Views	Views 14 and 15	Effect of the completed Proposed Development on views	Moderate Beneficial

ES AVAILABILITY AND COMMENTS

- 256** The Environmental Statement is available for viewing on the local planning authority's Planning Public Access. The local planning authority's Planning Public Access can be accessed by using the following link:

<https://www.gravesham.gov.uk/planning/view-comment-planning-application>

- 257** Comments on the planning application can be provided online via the LPA's Planning Portal, via email to planning.reps@gravesham.gov.uk (quoting the application number), or can be forwarded to the address below:

Planning Admin, Civic Centre, Windmill Street, Gravesend, DA12 1AU

- 258** Electronic Copies of the Environmental Statement and Non-Technical Summary and can be provided via a downloadable file provided by email. Printed copies of the Non-Technical Summary are available free of charge. Printed copies of the Environmental Statement Volume 1, 2 and 3 would incur a printing and postage charge. For further details please contact hello@triumenv.co.uk with reference in email header to "Environmental Statement Request – Northfleet Harbourside" or Tel: +44 (0) 203 887 7118.

Gravesham Borough Council



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