



**Genna Henry**  
**Gravesham Borough Council**  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

**Flood and Water Management**  
Invicta House  
Maidstone  
Kent  
ME14 1XX  
**Website:** [www.kent.gov.uk/flooding](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** GBC/2022/091379  
**Date:** 25 August 2022

**Application No:** 20220852

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

**Proposal:** Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the EIA Scoping Opinion Request report (July 2022) prepared by Trium Environmental Consulting and raise no objections or requirements for surface water drainage at this stage.

The LLFA understand from the Water Resources and Flood Risk Chapter (including surface water drainage) that these considerations are taken out of the EIA Scoping Opinion and will instead be covered in a separate report as part of any future planning submission. We accept this approach and will await for those details to be provided as part of a formal planning application.

The LLFA acknowledge statements 409,424 and 428 in regards to adhering to national and local planning guidance, incorporation of SuDS measures into the development and further consultation with the LLFA will be undertaken to discuss flood risk.

In addition to those policies referenced in statement 409, the LLFA would request the following KCC Policies are considered for designing a future surface water drainage scheme:

- Kent County Council's Drainage and Planning Policy Statement (2019)

- Kent Design Guide Making it Happen- Appendix C2 Drainage Systems

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

**Daniel Hoare**

Flood Risk Project Officer  
Flood and Water Management