



Delegated Report

EDC Consultation Application

Planning Application No: 20250486

Location: Berkeley Modular Limited Berkeley House Crete Hall Road Northfleet

Description: EDC Reconsultation EDC/25/0010 Change of use from B2 Use Class (General Industrial) and ancillary office to flexible B2 (General Industry), B8 storage and Distribution), E(g)(iii) (Industrial Processes) Uses with ancillary office, associated works and reuse of existing outside storage area to provide 68no. additional car parking spaces.

Applicant: Ebbsfleet Development Corporation

Site Visit Date: Desktop Assessment

Introduction

This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/25/0010), and is a reconsultation in respect of the Change of use from B2 Use Class (General Industrial) and ancillary office to flexible B2 (General Industry), B8 (Storage and Distribution), E(g)(iii) (Industrial Processes) Uses with ancillary office, associated works and reuse of existing outside storage area to provide 68no. additional car parking spaces.

Submitted Documents/Plans

The applicant has submitted the following in support of the application:

Consultation letter dated 15th May 2025.

Relevant Planning History

Reference	Description	Decision	Decision Date
20250172	EDC consultation EDC/25/0010 Change of use from B2 Use Class (General Industrial) and ancillary office to flexible B2 (General Industry), B8 (Storage and Distribution), E(g)(iii) (Industrial Processes) Uses with ancillary office, associated works and reuse of existing outside storage area to provide 68no. additional car parking spaces.	Observations Sent	19.03.2025
20190236	**RECONSULTATION** EDC Consultation (EDC/18/0176) - Application for approval of condition 12 attached to planning permission ref no. EDC/17/0039 providing details for the replacement boundary walls/railings.	Observations Sent	26.03.2019
20190235	**RECONSULTATION** EDC Consultation (EDC/18/0177) - Application for approval of condition 11 attached to planning	Observations Sent	26.03.2019

	permission ref EDC/17/0039 relating to the submission of a method statement for the proposed demolition, prior to the demolition of the front boundary wall of the WT Henley building.		
20190207	**RECONSULTATION** EDC Consultation (EDC/18/0191) - Application for minor material amendment to Reserved Matters approval reference EDC/17/0122 (relating to the development of a manufacturing facility for the production of modular housing with ancillary 2 storey office block and provision of a gate house, car parking, cycle storage, modular storage and dispatch bays and landscaping, comprising details of layout, scale, appearance and landscaping pursuant to outline planning permission EDC/17/0022 as amended by EDC/17/0123) to remove the living roof from the office roof, to amend details of the building elevations and to incorporate external plant.	Observations Sent	13.03.2019
20181296	EDC Consultation (EDC/18/0176) - Application for approval of condition 12 attached to planning permission ref no. EDC/17/0039 providing details for the replacement boundary walls/railings.	No Objections	21.12.2018
20181295	EDC Consultation (EDC/18/0177) - Application for approval of condition 11 attached to planning permission ref EDC/17/0039 relating to the submission of a method statement for the proposed demolition, prior to the demolition of the front boundary wall of the WT Henley building.	Observations Sent	21.12.2018
20181291	EDC Consultation (EDC/18/0191) - Application for minor material amendment to Reserved Matters approval reference EDC/17/0122 (relating to the development of a manufacturing facility for the production of modular housing with ancillary 2 storey office block and provision of a gate house, car parking, cycle storage, modular storage and dispatch bays and landscaping, comprising details of layout, scale, appearance and landscaping pursuant to outline planning permission EDC/17/0022 as amended by EDC/17/0123) to remove the living roof from the office roof, to amend details of the building elevations and to incorporate external plant.	Observations Sent	09.01.2019
20181159	**RECONSULTATION** EDC Consultation (EDC/18/0104) - Application for approval of condition 15 attached to planning permission reference no. EDC/17/0039 relating to details of material to be used to infill section of Crete Hall Road to be made redundant following the road realignment.	No Objections	07.11.2018
20181053	EDC Consultation (EDC/18/0157) - Application for approval of condition 13 pursuant to outline planning permission reference no. EDC/17/0123 relating to details of Operational Phase Local Employment and Training Plan insofar as it relates to development on the northern parcel only.	No Objections	30.10.2018
20181012	EDC Consultation (EDC/18/0104) - Application for approval of condition 15 attached to planning	No Objections	19.10.2018

	permission reference no. EDC/17/0039 relating to details of material to be used to infill section of Crete Hall Road to be made redundant following the road realignment.		
20180813	EDC Consultation- Application for the approval of conditions 8, 9, 10 11 (part), 12 (part) and 13 (part) pursuant to outline planning permission reference no. EDC/17/0123 relating to a Construction Environmental Management Plan, Archaeological evaluation, contaminated land assessment, surface water drainage, foul drainage, and local employment and training.	No Objections	24.08.2018
20171102	Consultation on application for the approval of Reserved Matters pursuant to Outline planning permission EDC/17/0022 for the development of a manufacturing facility for the production of modular housing with ancillary 2 storey office block and provision of a gate house, car parking, cycle storage, modular storage and dispatch bays and landscaping, comprising details of layout, scale, appearance and landscaping.		30.09.2019
20171091	Consultation on the construction of a new vehicular and pedestrian access from Crete Hall Road.	No Objections	30.09.2019
20170995	Application for the approval of conditions 20 & 21 attached to planning permission reference no. 20110320 relating to a remediation strategy and closure report. EDC Decision 19.10.2017	No Objections	12.10.2017
20170316	***ADDITIONAL INFORMATION*** Part full and part outline planning application comprising: (1) full planning application for the erection of 628 residential dwellings including affordable housing; retail floorspace (Use Classes A1, A2 and/or A3); amendments to existing highway access and realignment of Crete Hall Road; demolition of rear WT Henley Building; provision of open spaces, equipped areas of play and landscaping; and associated internal accesses/roads, parking, infrastructure, attenuation features and earthworks, and (2) outline planning application (with all matters except access reserved) for a two form entry primary school and for the refurbishment, change of use (for Use Classes A1/A2/A3/B1(a)/C3/D1) and demolition of the boundary wall and rear portion of the WT Henley Building.	Observations Sent	08.08.2017
20160924	Request for a Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) in respect of proposed development of brownfield land to provide up to 240,000sq.ft of employment floorspace.	Observations Sent	31.10.2016
20160796	Request for a Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) in respect of residential-led development comprising up to 700 dwellings, up to 140sqm retail floor space and a primary school.	Observations Sent	31.10.2016

20150542	EDC - Application for approval of condition 21 attached to planning permission reference no. 20110320 relating to a contamination closure report.	Approval of Details	17.08.2015
20140630	Application for the approval of conditions 2, 7, 8, 9, 10, 16, 17, 18, 19, 23, 26, 27, 28, 29 and 36 attached to planning permission reference number 20110320 relating to detailed phasing plan and timetable for the land raising; details of the stock piling areas of material to be used; details of the construction compound and storage of plant and equipment; details of pre-treatment of materials; a method statement for the compaction of materials; details of the circulation routes and parking areas; details of the construction access points, engineering details of the boundary treatments to the existing highway; details of wheel washing and chassis cleaning equipment; Environmental Management Plan; external lighting scheme; details of diversion and/or protection of the public footpath; full details of the final design of the land raising works up to the sea wall; details of new boundary treatments including in relation to the river defences and adjacent public footpath measures of protection to the public sewers and water mains.	Approval of Details	29.01.2015
20140423	Application for the variation of condition 6 attached to planning permission ref. no. 20010288 relating to the change of use to full port operational use including the unloading and loading, storage30.09.2019, trans-shipment and distribution of aggregates together with the erection of ancillary offices, associated parking spaces, cargo handling equipment and a boundary wall and construction of access to the property, to allow unrestricted operating hours on weekdays only.	Temporary Permission	23.06.2014
20130840	Application for variation of condition 3 attached to planning permission reference number 20110320 for a minor variation in imported materials on the Fleetway land parcels and Phase 4 within the boundaries of the previously approved land raising operations for the site.	Permission	17.12.2013
20130699	Application for approval of condition 4 attached to planning permission reference number 20110320 relating to the additional source of clay material becoming available.	Approval of Details	05.09.2013
20130494	Application for the approval of condition 4 attached to planning permission reference number 20110320 relating to the composition and source of the cohesive cover layer, which is being used to raise the site level from 6.29m Ordnance Datum to final formation level of 6.54m Ordnance Datum.	Approval of Details	11.07.2013
20130476	Application for minor material amendment to planning permission reference number 20110320 comprising land raising works of the ramp at the western boundary of Phase 1 - amended to extend the land raise into Phase 3a of the development site and land raising works along the eastern boundary of Phase 2 - amended to extend the land raise to the edge of the existing cliff-face along the eastern boundary of the site.	Permission	05.09.2013

20130273	Application for approval of condition 18, 28 and 29 attached to planning permission reference number 20110320 relating to the boundary treatments to existing highway, land raising works and boundary treatments in relation to river defences.	Approval of Details	21.05.2013
20130242	Prior Notification of the proposed demolition of Henley's Jetty.	Prior Approval Not Required	11.04.2013
20130201	Proposed demolition of Henley's Jetty.	Environmental Impact Assessment Not Required	22.03.2013
20130081	Application for approval of condition 24 and 36 attached to planning permission reference number 20110320 relating to the additional air quality assessment and measures to protect public sewers and water mains.	Approval of Details	20.02.2013
20130063	Application for approval of conditions 18, 20, 30, 31 and 37 attached to planning permission reference number 20110320 relating to the specific engineering details of the boundary treatment to existing highway, revised remediation strategy, protection of Henley Tunnels, future access and protection to Henley Tunnels and method of containment of water on site.	Approval of Details	20.02.2013
20130061	Application for approval of condition 23 attached to planning permission reference number 20110320 relating to the Environment Management Plan	Approval of Details	20.02.2013
20130054	Application for prior notification of the demolition of the Fleetway building.	Prior Approval Not Required	18.02.2013
20130045	Application for approval of condition 12 attached to planning permission reference number 20110320 relating to the delivery arrangements of materials to the site.	Approval of Details	20.02.2013
20121106	Application for approval of conditions 2, 4, 7, 9 and 10 attached to planning permission reference number 20110320 relating to the phasing plan, composition and source of waste materials, stock piling areas, pre-treatment of materials and method statement for compaction of materials to be used in each phase.	Approval of Details	20.02.2013
20121027	Application for the approval of conditions 8, 16, 17, 19, 26, 27 and 32 attached to planning permission reference number 20110320 relating to construction compound, circulation routes and parking areas for each phase, construction access points, details of type and location of wheel wash and chassis cleaning equipment, external lighting scheme, diversion/protection of public right of way and protection measures for WT Henley office building.	Approval of Details	06.02.2013
20120971	Application for approval of conditions 21, 22 and 34 attached to planning permission reference number 20110320 relating to the closure report, monitoring and maintenance scheme and archaeological investigation.	Approval of Details	07.02.2013
20110320	Engineering operations comprising land raising and the creation of a development platform including demolition of 5 additional buildings on a phased basis and revised land raising design.	Permission	11.11.2011

Kent Police Designing Out Crime

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

Commercial – Class B2/B8 Use

1. We recommend boundary treatments be a minimum of 2m and the installation of lockable gates to the sides of the unit to provide controlled access to the rear. These gates must be flush to the building line to optimize surveillance.
2. We recommend natural surveillance for parking areas. As a secondary layer of security, we would also recommend CCTV be installed to further monitor use. We also strongly recommend gating access roads/ parking areas to prevent nuisance parking and misuse out of hours.
3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. Cycle storage must be well lit and with natural surveillance. We recommend the sold secure or SBD recommended products for additional security.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. we recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.
6. CCTV to be installed, especially in areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car park and reception, main office/ safe. The CCTV must not infringe any lighting plan.
7. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
8. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
9. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
10. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013
11. Bin Stores must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it

can be used as a climbing aid into the building when closed.

12. If any buildings are to have roof access for maintenance of solar panels and lift shafts etc., we recommend that ladders/ access doors to these areas are securely locked so that members of the public are unable to access this area. We also require CCTV to cover this area in order to monitor unauthorized access.

13. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

14. The Access Control, Doorsets and Windows should also meet SBD Commercial 2015 advised standards. Any public access to commercial units should be restricted to one main public/visitor entrance into the building. Reception, Audio/Visual systems linking to the reception or personnel managing access control is essential for businesses that could attract crime risk (we can advise). For doorsets, we recommend minimum standards of PAS 24:2022, LPS 1175: Issue 7, SR2, STS 201 or STS 202: Issue 3, BR2. Units may require additional strengthening for some uses.

Commercial – Class E Use

15. CCTV is advised for all areas, especially at entry points, till areas, and other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.

16. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.

17. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.

18. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.

19. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution.

20. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.

21. Parking - Where unavoidable, the car parking area must be covered by natural surveillance from an "active" window e.g. reception and sufficient lighting. In addition, we recommend CCTV and appropriate signage for visitor bays to avoid conflict and misuse.

22. We advise on the use of ground/ wall SBD or sold secure anchors within a cycle storage area/ sheds of dwellings to deter bicycle theft. Bin storage must also be secure with access control.

23. Waste bins should be kept in a secure enclosure, ideally away from the building as bins can become a climbing aid or even an arson hazard.

24. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013

25. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant,

machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Internal Consultations

GBC – Environmental Protection

The following comments are made:

Noise

Bureau Veritas has reviewed the submitted noise impact assessment on behalf of EDC and provided an Advisory Technical Note which has been reviewed. In terms of operational noise, it's noted that an assessment of use as a parcel distribution centre has been considered. Potential impacts from HGV movements, parking on site, operational noise and changes to traffic movements/numbers has been reviewed. The report concludes that even if the use is for B8 (parcel distribution) there will be a negligible impact on the nearest noise sensitive receptors both in terms of internal noise levels and also noise levels in gardens.

Without reviewing the NIA itself (for which I do not have time), I'm not in a position to dispute these findings.

However, due to the number of residential premises in very close proximity, it is re-iterated that careful consideration of the 24-hour use must be considered. As highlighted previously, the parking area and plant room are on the side of the property closest to the residential area. Also, the 'goods in' area is at this end of the building. These are all areas that could result in noise at night leading to noise complaints, particularly in warmer months when windows are open, which will fall to GBC to investigate.

In terms of any new plant/equipment to be installed as a result of new occupiers, the following condition is advised:

Noise – new plant/equipment

The rating noise from any new fixed building services/mechanical plant/equipment, including any air systems, associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014.

Details of any new/proposed fixed building services/mechanical plant/equipment shall be submitted for approval and must demonstrate, by the submission of an appropriate noise assessment that the above requirements will be complied with prior to installation.

Air Quality

Logika has provided an Advisory Technical Note of the Stantech Air Quality Assessment on behalf of EDC. The technical note concludes that the air quality assessment has been undertaken satisfactorily and based on updated traffic data there will be no material impact on air quality.

As with the noise technical note, without reviewing the air quality assessment itself, (for which I do not have time), I'm not in a position to dispute these findings.

GBC – Economic Development Manager

No comments received.

GBC – Waste & Recycling Manager

No comments received.

Planning Assessment/Comments

This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/25/0010), and is a reconsultation in respect of the Change of use from B2 Use Class (General Industrial) and ancillary office to flexible B2 (General Industry), B8 (Storage and Distribution), E(g)(iii) (Industrial Processes) Uses with ancillary office, associated works and reuse of existing outside storage area to provide 68no. additional car parking spaces.

Recommendation

The EDC is requested to consider the recommendations from Kent Police Designing Out Crime Officer and GBC – Environmental Protection.

The EDC is thanked for consulting the Borough Council.

Case Officer:	Ms Amanda Cue	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	5 th June 2025	Dated:	06 June 2025