

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

To: **Ebbsfleet Development Corporation**
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet Valley
Kent
DA10 1EE

TAKE NOTICE that the **GRAVESEND BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Abacus Corner**
Land East Of College Road And South Of The Creek
Northfleet
Kent
DA11 9AU

and being **EDC Re-Consultation EDC/25/0104 - Full Planning application for the redevelopment of the site for 68 residential units (Class C3), a commercial unit (Classes E (a) and (b)) and highway to support Fastrack bus route, together with associated parking, commercial unit service bay, access, private amenity areas, public realm, hard and soft landscaping, biodiversity enhancements and associated infrastructure.**

Referred to in your application dated 26 September 2025.

The application comprises an Ebbsfleet Development Corporation consultation on application EDC/25/0104 for the redevelopment of the site for 68 residential units (Class C3), a commercial unit (Classes E (a) and (b)) and highway to support Fastrack bus route, together with associated parking, commercial unit service bay, access, private amenity areas, public realm, hard and soft landscaping, biodiversity enhancements and associated infrastructure.

The below consultee responses should be taken into account in the assessment of this application by the EDC.

GBC Environmental Protection

The covering letter from EDC advises that this is a re-consultation. However, it does not appear that Environmental Protection have been formally consulted previously regarding this application.

It is noted that several technical reports have been submitted with this application - a noise impact assessment, air quality assessment, lighting assessment and geo-environmental report. As with

any EDC application, we will not provide comments on technical reports but will await EDC's consultants peer reviews/summaries of the reports and provide any recommendations/comments based on those.

An email was received from EDC on 18/08/2025 in relation to a peer review by Bureau Veritas (dated 14/08/2025) for the noise impact assessment. The email advised that the applicant was going to be contacted with regards to matters raised in the peer review, so no comments should be made by us at this time. To date I have not reviewed anything further.

GBC Parking

- Parking restrictions at the two locations along College Road, both with different parking restrictions, would be acceptable.
- Civil enforcement officers patrol this area already and therefore the parking spaces can be patrolled.
- As long as resources allow, if an issue is identified at a specific location, officers will be directed to patrol there.
- As such, proposed residential visitor parking will be for a 4-hour maximum time limit no return for 2 hours on College Road, with the commercial unit visitor parking remaining at the proposed 20-minute time restriction.
- EV charging is being explored in the Borough with GBC and KCC. This is especially in areas where there is a need for additional facilities. However, it was noted that Harbour Village will provide extensive EV charging infrastructure in the local area already. EV charging will therefore not be proposed on College Road at this stage.
- Any proposed on-road landscaping on College Road would need to be agreed with the adoptions team. KCC would be responsible for advice on this point.
- It is KCC's responsibility to implement a one-way restriction on College Road, if required.
- The previously estimated budget for implementing these works remain consistent with what was quoted in April 2025.
- The use of cones at the proposed servicing layby would be the responsibility of the occupier and use would align with their expected delivery times. However, this would be purely a workaround as it is expected that the loading bay at the front of the commercial premises would suffer from regular customer parking and it would not be feasible/possible for Gravesham's Civil Enforcement Officers to enforce all contraventions.
- S106 costs: TRO amendment costs - £3,000; sign and line costs - £2,000. These costs would still stand with the additional three bays.

GBC Planning Policy

The application site lies within the Northfleet East and Swanscombe Peninsula East Opportunity Area, where strategic policy CS03 applies. This policy recognises the substantial opportunity for major riverside regeneration and the significant benefits to existing adjoining residential communities, regeneration will bring.

This site lies within the Old Northfleet Residential Extension Key Site (sub area 1.4). Policy CS03 sets out that the key site will provide a residential development of around 530 dwellings, open space, an extension and improvements to The Hive local centre and provision of community facilities. The key site plan (figure 6) shows the sites as being an existing employment site rather part of the future residential development.

The site lies adjacent to the Harbour village proposal which was granted outline planning permission under application reference EDC/21/0081. Subsequent reserved matters applications have been approved and are being brought forward as follows:

- Reserved Matters approval for Phase 1B was granted in January 2022 (LPA Ref. EDC/21/0081),
- approval for Phase 2 was granted in July 2023 (LPA Ref. EDC/22/0058) and these phases are currently under construction.

- Reserved Matters approval for Phase 3A was granted in December 2024 (LPA Ref. EDC/23/0086).

An application for Phase 3B is currently being considered by EDC but held in abeyance to enable an integrated approach to be developed alongside this proposal.

Employment - Conflict with CS07

As indicated above the site is an existing employment site and as such proposals are subject to Policy CS07 Economy, Employment, and Skills. The policy seeks to protect the Borough's existing employment offer, and in particular resists the loss of existing B class employment floorspace. Where proposals will result in such a loss, as is the case here, policy CS07 lists a set of criteria that need to be addressed to justify any loss. These are as follows:

- the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or
- the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or
- the existing premises have an unacceptable environmental impact on the area within which they are situated, and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.

I am unable to find any justifications for the loss of employment floorspace in the documentation (I cannot download the Planning Statement) and as such there is a conflict with Policy CS07.

Retail - Conflict with CS03/CS08

The proposal also conflicts with Policy CS03 and Policy CS08 in respect of the retail element of the proposal.

As indicated above the proposal forms part of the Old Northfleet Residential Extension Key site where Policy CS03 seeks to secure an extension and improvements to The Hive Local Centre to consolidate its role in meeting the existing and new community's day to day retail need. The introduction of a retail unit within this proposal would fail to achieve this, given its distance from the existing Local Centre, plus there are concerns that it may affect the vitality of the Local Centre.

The Council's retail strategy is set out in Policy CS08 Retail, Leisure and the Hierarchy of Centres. The strategy seeks to reinforce a sustainable network and hierarchy of centres by maintaining the sub regional role of Gravesend Town Centre, protecting and enhancing existing local centres and creating additional local centres to meet local retail needs generated by new development on key sites. The policy goes on to spell out the Council's approach, such as to:

- Apply a sequential approach to the location of town centre uses,
- support development of a scale and type appropriate to the position of the centre in the hierarchy and their character,
- safeguard the retail character and function of existing by resisting development which would adversely affect their vitality and viability,
- encourage a mix of units.

The policy supports proposals for new local centres and the expansion of existing centres where they are of a scale and form designed to meet local needs arising from associated planned new development. Reference is specifically made to the Old Northfleet Residential Extension Key site and supports the extension of The Hive Local Centre. The proposed location of new retail provision, away from the current local centre would neither protect or enhance The Hive local centre and therefore this aspect of the proposal runs contrary to Policy CS08.

The applicant has undertaken a sequential test. The scope of the test, as set out in the methodology sought to focus on the alternative sites within or on the edge of The Hive Local Centre as this was considered it to be the only centre that could meet localised retail need. This is considered reasonable; however, the actual scope of the site search is limited to The Hive itself, and no consideration has been given to any opportunities along the High Street itself, close to The Hive. An expansion of the area of search to include the High Street would still serve to support the Local Centre, being on its edge and capable of meeting localised day to day retail need.

The PPG guidance encourages liaison between the LPA and the applicant when undertaking the test. I am unaware of any discussions that have taken place with the EDC in this regard.

In considering this aspect of the proposal it is helpful to understand the background. Application reference EDC/16/0004 condition 8 required the submission of a detailed masterplan for the site based on drawings listed in condition 4 of the planning approval and consistent with agreed phases of development. A list of considerations included the location of a neighbourhood centre, including a community centre.

The supporting Retail Report draws attention to the submission of a detailed Masterplan for sub area 1.4 (EDC/20/0080) pursuant to condition 8. GBC comments acknowledge that the proposal omits details of a mixed-use neighbourhood centre including community centre and there was a need to understand why (20200557). The EDC report (EDC/20/0080) merely states that the developer has decided not to include a neighbourhood centre and condition 8 did not require it to be delivered.

While an opportunity to secure an expansion of The Hive or to deliver additional retail provision close to The Hive in earlier phases of the development of this area may have been lost, it is important to ensure that the sequential test explores any opportunities to enhance or expand the retail provision at The Hive or in the nearby High Street are fully explored. The scope of the assessment should therefore include liaison with the Council's Property Services Department and an assessment of opportunities nearby along Northfleet High Street.

Design

In terms of the detailed design, this is a matter for the EDC to consider, in line with adopted policy CS19 (Development and Design Principles) and the Council Supplementary Planning Document - Design for Gravesham - design-for-gravesham-design-code-spd-

SAMMS contribution

The site lies within the 6km zone around the Thames Estuary and Marshes Special Protection Area and RAMSAR site, which is part of an internationally important landscape for nature conservation and wintering birds. Evidence indicates that new development is likely to lead to an increase in the recreational use of this area, with consequential negative impacts on the habitats that support wintering birds that migrate to this area each year.

The developer has two options when seeking to address harms to the SPA/RAMSAR site, either by making a developer contribution or gathering evidence for a HRA and implementation of the necessary mitigation measures in perpetuity. In this case it is noted that the developer proposes to make a financial contribution payment towards SAMMS (see Technical Note: Ecology dated June 2025. It is assumed that appropriate measures will be put in place to ensure this contribution is delivered.

Affordable Housing

In terms of affordable housing provision, the development should deliver 30% affordable housing in line with adopted Policy CS16. In terms of affordable housing tenure, the latest housing need data should be obtained from the Council's Housing Strategy Manager.

Car Parking

I can see from the submitted comments that KCC have many issues with this scheme, including the parking provision and arrangements. I assume that they will therefore pick up any deficiencies.

I would however comment that there is a lack of dedicated parking associated with the new convenience store and a lack of visitor parking generally across the scheme which may lead to indiscriminate parking around the junction by people popping into the shop. This is hard to manage, and practical measures need to be incorporated within the scheme to prevent this.

Heritage

In addition, I would ask for KCC Heritage comments to be taken account of, given previous heritage matters that have arisen with adjacent development.

GBC Leisure

Access to high quality open spaces and provision of opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

Sport England outline that consideration should be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.

Due to location of the proposed development, it would not be expected for the developer to provide formal leisure provision on site, but it is reasonable to expect the applicant to offset the impact of its development on existing leisure facilities within the area. The approach promoted by officers is to secure a financial contribution towards the upgrading and development of local sporting and recreational facilities located within a reasonable distance of the application site, such that it will be directly related to the development and will contribute to offsetting the impact of the increased population.

Based on all the assessment data currently available including, the Open Space, Sport & Recreation Assessment compiled by Knight Kavanagh & Page in 2016 and updated indoor leisure feasibility study 2022; there is particular shortage in the provision of artificial pitches, a shortage of junior/youth grass pitches coupled with an ageing leisure centre facility stock.

Using the Sport England Sports Facility Calculator (SFC) and working on the assumption that approximately 170 residents may potentially reside within the new development (based on an average of 2.5 residents per residential dwelling), the SFC gives an indicative S106 contribution figure of £88,682.

Recommendation

The above observations should be considered as part of the assessment of this application.

Ebbsfleet Development Corporation is thanked for consulting the Borough Council.

Dated this 16th day of October 2025

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