



Delegated Report

Adjoining Authority Consultation Application

Planning Application No: 20250975

Location: Abacus Corner Land East of College Road and South of The Creek
Northfleet Kent

Description: 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.

Applicant: Ebbsfleet Development Corporation

Site Visit Date: Desktop assessment

Submitted Documents/Plans

Ebbsfleet Development Corporation has submitted the following in support of the application:

Consultation letter dated 26 September 2025

Relevant Planning History

Reference	Description	Decision	Decision Date
19920145	Use of site as an extension to the adjoining contractors yard for the storage of plant and machinery, stationing of 3 no. temporary portacabins to form ancillary office and parts storage and laying out of 13 no. car parking spaces.	Permitted	07.05.1992
19830098	Erection of extension at side to form loading bay area additional workshop area with storage over and wc at the rear	Permitted	27.06.1983
19770959	Change of use of existing garage and yard to industrial use	Permitted	19.12.1977
19760042	Erection of a single storey extension to workshop and a single storey extension for a steel store	Permitted	30.03.1976
19480931	The construction and use of a building as office accommodation	Permitted	31.12.1948

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS03 – Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- CS07 – Economy, Employment and Skills

- CS08 – Retail, Leisure and the Hierarchy of Centres
- CS11 – Transport
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC7 – Other Archaeological Sites
- T1 – Impact of Development on the Highway Network
- T5 – Access to the Identified Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 – Building a strong, competitive economy
- Section 7 – Ensuring the vitality of town centres
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Officer's Analysis

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.

External Consultees

Kent Police

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.

Dwellings

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.
2. Perimeter, boundary and divisional treatments must be a minimum of 1.8m in height. Any alleyways to have secure side gates, which are lockable from both sides, located flush to the front building line.
3. To meet SBD guidance we would strongly recommend the installation of pavements on both sides of the roads to avoid vehicle and pedestrian conflict and promote safer spaces for families. It is now common practice to have some shared vehicle/ pedestrian areas on secondary routes. If pavements cannot be installed in these shared spaces, we strongly recommend traffic calming measures, especially where there is a curvature in the road.
4. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or sold secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse. For car parks, we recommend the Safer Parking Scheme, which follows CPTED guidance from both the police and the British Parking Association.
5. Pre-existing and 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.
6. 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. Bollard lighting should be avoided, SBD Residential (Homes) 2025 Guide states: "19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It

should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features.” Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.

7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.

8. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies 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.

9. 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. Please note commercial and residential bin and cycle stores must be segregated to prevent conflict.

10. Mail delivery to meet SBD TS008 with a fire guard are strongly recommended for dwellings. For buildings with multiple occupants we recommend TS009 standards. Please note we advise against trade buttons, if mail is to be delivered inside a lobby there must be an airlock/ access-controlled door to prevent access further into the building for anyone other than residents. This would also be suitable for the commercial area, if there will be no dedicated personnel responsible for accepting mail.

11. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.

12. We recommend “A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019” for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.

13. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.

14. CCTV is advised for all communal entry points and to cover the mail delivery area.

15. Security Compartmentation is required in larger apartment blocks (over 25 units) or fewer in densely populated buildings or areas of higher crime. It helps reduce the opportunity for crime, the taking over the home of a vulnerable person in order to create a base for criminality and unauthorised free access throughout the building. It can be achieved with formal access control on lifts, staircases and lobby doorsets on all floors.

16. Defensible spaces. Corner properties require well established boundaries to avoid desire lines across front gardens. This can be provided by using hedges or knee rails/ fences, for example.

17. Blank Walls. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, inappropriate loitering, and ball games. The provision of a 1m buffer zone using either a 1.2 – 1.4m railing or a 1m mature height hedge with high thorn content should address those issues.

18. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing nuisance.

19. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict or ball games causing nuisance. For any LAP or LEAP, we recommend fencing at a minimum height of 1.2m and vandal resistant play equipment. Consideration should be given to a single dedicated entry and exit point to enable adult control/supervision.

20. Community areas/ gardens will also require more natural surveillance, appropriate boundary treatments and access control as they generally attract Crime, ASB and nuisance. It is also advised that tools and equipment that are either of high value, or can be used to commit an offence are either not left overnight or secured in lockable storage areas.

21. Public Footpaths should be at least 3 metres wide to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people.

22. Planting. We would recommend dense / prickly planting to ensure individuals stay on pedestrian routes, and do not create desire lines. or spaces where potential offenders can hide from view.

Commercial Unit (Class E)

23. CCTV is advised for all areas, especially at entry points, till areas and any other areas where cash handing might take place, and other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.
24. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
25. 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.
26. 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.
27. 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.
28. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
29. 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.
30. 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.
31. 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.

If approved, site security is required for the construction phase. There is a duty for the principal 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 Consultees

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.

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	16th October 2025	Dated:	16 October 2025