

# Delegated Report

## Adjoining Authority Consultation Application

**Planning Application No:** 20251145

**Location:** Thames House College Road Northfleet Gravesend

**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 7 November 2025

### Relevant Planning History

Reference	Description	Decision	Decision Date
20250975	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.	Observations sent	16.10.2025
20250762	EDC 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.	Observations sent	17.10.2025
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	Permitted	27.06.1983

	rear		
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)
- Guidance – Town Centres and Retail (2020)

#### **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.

In response to the Council's comments for the previous consultation application, the applicant's agent provided additional commentary related to the retail sequential test with respect to Northfleet High Street.

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

#### Internal Consultees

##### *GBC Planning Policy*

The additional details provided have been reviewed - this essentially amounts to checking whether any of the commercial premises in and surrounding the Hive are on the market and whether they would be of a suitable size. The conclusion is that there are no alternative site opportunities available.

The submitted retail assessment sets out the national planning policy context for undertaking a retail sequential test where a developer is proposing an out-of-centre location which fails to comply with an up-to-date local plan. The NPPF sets out that a sequential test should be applied for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. It goes on to state that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites well connected to the Town Centre. The Town Centres and Retail guidance sets out that main town centre uses, such as that currently proposed, should be guided to the town centre locations first, and the suitability of more central sites to accommodate the proposal should be considered. If neither town centre nor edge-of-centre locations are available, out-of-centre locations such as this can be considered, with a preference being given to sites which are well connected to the town centre. EDC will need to satisfy themselves that:

- the lack of any assessment as to whether there is a more centrally located suitable site available to accommodate the proposed development accords with national planning policy; and
- there is sufficient justification in the report to support the reduced scope of the sequential test undertaken.

Policy CS08 of the Local Plan Core Strategy is clear that a sequential approach to the location of main town centre uses such as this will be applied. It goes on to state that proposals for new local centres and the expansion of existing centres will be supported where they are of a scale and form designed to meet local needs arising from new development. The Old Northfleet Residential Extension key site is identified as a location where support will be given to new retail provision as an extension to The Hive, as provision in this location would serve both the existing and new communities and would be located on a main route into the town centre. GBC accepts that there are no available sites within the Hive or its vicinity along the High

Street and as such additional retail provision to meet the needs of the existing and new population cannot be delivered in line with the policy.

**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.

<b>Case Officer:</b>	Mrs Katherine Parkin	<b>Team Leader:</b>	Mrs Faye Walsh
<b>Signed:</b>	<i>K. Parkin</i>	<b>Signed:</b>	<i>f Walsh</i>
<b>Dated:</b>	3 December 2025	<b>Dated:</b>	03 December 2025