



**Application: 20251145**  
**Your Reference: EDC/25/0104**

**TOWN AND COUNTRY PLANNING ACTS**

**TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992**

**OBSERVATIONS TO THE 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 **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **OBSERVATIONS** for development of land situate

at **Thames House**  
**College Road**  
**Northfleet**  
**Gravesend**  
**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 11 November 2025.

The application comprises an Ebbsfleet Development Corporation re-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 response should be taken into account in the assessment of this application by the EDC.

**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 connect 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:

- o 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
- o 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.

Ebbfleet Development Corporation is thanked for consulting the Borough Council.

Dated this; 4 December 2025

Address; Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

*Shazad Ghani*  
**MPhil, MA, BA (Hons)**  
**Head of Planning**  
**Planning Service**