



**Application: 20250172**  
**Your Reference:**

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

at **Berkeley Modular Facility**  
**Berkeley House**  
**Crete Hall Road**  
**Northfleet**  
**Gravesend**  
**Kent**  
**DA11 9AA**

and being **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.**

Referred to in your application dated 27 February 2025.

**GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-**

This is an application submitted to the Ebbsfleet Development Corporation (EDC) as the determining authority (EDC ref EDC/25/0010), and is a consultation 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.

In respect of the documents the subject of this re-consultation, the EDC is advised that in response to external consultation and previous internal consultation it has received the following responses:

**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.

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. Please note where there is a mixed-use building, residential and commercial bins must be segregated.
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.

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.

#### GBC - Environmental Protection

This is an EDC consultation, and it's noted several technical reports have been submitted - an Air Quality Assessment, a Noise Impact Assessment and information relating to external lighting. As with any EDC application, we will not review and comment on these technical assessments. It has previously been agreed with EDC that their consultants will review these and provide a technical summary of the reports and submit these for our comments.

Consequently, we will not be commenting on the technical reports submitted and will await review summaries by EDC's consultants, at which point we will make our comments. It should however be highlighted to EDC that due to the number of residential premises in very close proximity, careful consideration of the 24-hour use must be considered. In particular the parking area and plant room are on the side of the property closest to the residential area. Also, the 'goods in' area is also at this end of the building. These are all areas that could result in significant noise particularly overnight.

The EDC is requested to consider the recommendations from Kent Police Designing Out Crime Officer and GBC - Environmental Protection, especially regarding the operating hours and parking area and plant room on the impact on neighbouring amenity. It is also recommended that EDC should engage with GBC Environmental Protection directly on technical reports/details.

The EDC is thanked for consulting the Borough Council.

Dated this 19th day of March 2025

Address; Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

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