



Application: 20240410
Your Reference: EDC/23/0097

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 **Former Northfleet Cement Works**
The Shore
Northfleet
Gravesend
Kent
DA11 9AN

and being **EDC RE CONSULTATION EDC/23/0097 - Reserved Matters Application (matters relating to access, layout, scale, appearance and landscaping) for the erection of industrial and logistics units (Use Classes E (g) (iii) and/or B2 and/or B8) with ancillary office accommodation, open storage areas, staff and operational vehicle parking, servicing and associated works.**

Referred to in your application dated 8 May 2024.

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/23/0097), and is a re-consultation in respect of the reserved matters application (matters relating to access, layout, scale, appearance and landscaping) for the erection of industrial and logistics units (Use Classes E (g) (iii) and/or B2 and/or B8) with ancillary office accommodation, open storage areas, staff and operational vehicle parking, servicing and associated works.

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:

External Consultations

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. 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.
3. Defined pedestrian routes to/from the building are recommended to improve safety and avoid pedestrian and vehicle conflict. Any pathways designed for emergency exit from the doorways on the side and rear elevations must be gated at the entrance to them and they must be level with the front building line to avoid recesses. During times when the buildings are occupied it must always be possible to exit through these gates without the use of a key.
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. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
7. 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.
8. 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.
9. 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
10. 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.
11. 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.
12. The Access Control, Doorsets and Windows should also meet SBD Commercial 2023 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). Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas. Adequate access control should be applied to the storage areas to prevent unauthorised access.

13. Parking. 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.

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.

Internal Consultations

GBC - Highways Officer (comments from previous application with ref. 20230798)

1. The plans giving walking distances are totally inaccurate, as the crow flies is not representative, when there are cliff and railway embankments in the way.
2. It is concerning that the Transport Statement states in its Trip Generation section, that 884 vehicles arrive in the am peak period with some 252-departing leaving a difference all types of vehicles of 632 which have to be accommodated on site somewhere, whilst these vehicles are not all cars, it does suggest the level of car parking provision is totally inadequate. (Note in the PM peak 795 vehicles depart the site whilst only 232 arrive, meaning 463 vehicles of all types were on site before the peak period.

It is noted that the Transport Statement includes both EDC/23/0096 and 97.

However, EDC/0096 only provides 53 spaces and EDC0097 provides 220 spaces (taken from the Transport Statements) giving a total of 273 spaces across both applications which is considerably less than the difference between arrivals and departures.

There may be other issues that a more detailed study will highlight, but for now I consider the application is not representative of the true situation and should be revised to reflect the true situation and account for the large difference between arrivals and departures during the peak periods.

The EDC is requested to consider the recommendations from Kent Police Designing Out Crime Officer.

The EDC is thanked for consulting the Borough Council.

Dated this 29th day of May 2024

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