

Reference: EDC/23/0078

Site Address: Land at Former Northfleet Cement Works, The Shore, Northfleet, Gravesend, Kent DA11 9AN

Proposal: Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land south of the River Thames (Phase 3B) comprising the erection of 39 no. dwellings together with associated infrastructure including details relating to finished floor and site levels, noise attenuation measures, ecological mitigation and enhancement strategy, and schedule of public open spaces (condition 9), renewable energy, water conservation and carbon reduction technologies (Condition 11), design and maintenance of the public realm and other areas with a public amenity function, provision of and timetable for installation of public art and heritage interpretation (condition 15).

Applicant: Bellway Homes Limited (Thames Gateway)

Parish / Ward: Northfleet and Springhead

SUMMARY:

This application seeks approval for all reserved matters for 39no. homes, comprising 21no. one and two bed apartments and 18no three bed houses located to the north-west of the Northfleet Embankment West mixed-use development site. The scheme represents part of the third residential phase of delivery by Bellway Homes who are marketing the land as 'Harbour Village'.

The site forms part of EDC's strategic allocation at Northfleet Riverside and would make a positive contribution towards achieving a key aspiration for development in this area. In particular, it supports the objective of reconnecting existing communities with the River Thames while delivering a range of high-quality homes and recreational spaces.

A total of 9no. dwellings (23%) would be provided as affordable housing, comprising 2no. units for affordable rent and 7no. units for shared ownership. This represents a meaningful contribution to local housing needs and fully satisfies the cumulative Section 106 affordable housing requirements for Harbour Village as set out in the Outline Planning Permission (OPP).

The application is guided by the approved residential masterplan, which establishes the overarching vision for Harbour Village, including the creation of a sustainable neighbourhood, strong connections to the River Thames, and a distinct sense of place informed by the site's character and heritage. The proposals build on the design principles established in earlier phases and would integrate well with the proposed adjoining Abacus Corner development (EDC/25/0104). A clear street hierarchy is retained, framing key views and strengthening visual and physical connections across the site and towards the River Thames and Northfleet and providing a strong frontage and enclosure to the approved Fastrack bus road. Overall the scheme demonstrates good quality design and placemaking principles, achieving 9 'Green' scores across the 12 Building for a Healthy Life categories.

All dwellings are designed to meet the Nationally Described Space Standards, with 23no. dwellings meeting Building Regulations Part M4(2) which exceeds the minimum Section 106 Agreement requirement. Sustainability is embedded throughout, including energy-efficient homes, water efficiency measures, electric vehicle charging, biodiverse brown roofs on the apartment building, and biodiversity measures such as native planting, bat and bird boxes. The scheme also supports active travel and lower-carbon transport.

The proposal is considered to accord with the principles and parameters established by the outline planning permission, detailed residential masterplan and adopted planning policies, and to be aligned with the Ebbsfleet Implementation Framework. The application is therefore recommended for approval subject to planning conditions.

This application is interdependent with application EDC/25/0104 (Abacus Corner) in relation to: the two site boundaries materially overlap; access for vehicles, pedestrians and cyclists from Phase 2 to the western part of the Abacus Corner development travel through this site using infrastructure only provided within this site boundary; highway works within College Road provide highway safety and manoeuvring measures required for both developments; the College Road layout of visitor parking spaces and yellow lines, proposed under the Abacus Corner application, intrinsically relate to the development layout (parking spaces for the house fronting College Road) proposed under this proposal; KCC Highways advise both developments would depend on the visitor parking spaces being provided within College Road proposed under the Abacus Corner application; car parking allocation and adapted cycle spaces are provided for these developments cross boundary.

RECOMMENDATION: Authority be delegated to the Director of Planning and Place to approve the application and issue reserved matters approval, subject to the imposition of the planning conditions as set out below, with delegated authority to the Director of Planning and Place to make minor changes to the wording.

CONDITIONS:

Approved Plans and Documents

1. The development hereby permitted shall be carried out in accordance with the following approved plans and pursuant to any planning conditions contained hereinafter:

Site Plans:

EVH3-BPTW-ZZ-ZZ-ST-A-0010 rev C01 (Location Plan)
EVH3-BPTW-S01-00-DR-A-0155 rev C04 (Site Plan – Ground Floor)
EVH3-BPTW-S01-01-DR-A-0156 rev C04 (Site Plan – Typical Floor)
EVH3-BPTW-S01-04-DR-A-0159 rev C03 (Site Plan – Roof)

Affordable Housing:

EVH3-BPTW-ZZ-00-M2-A-7100 rev C04 (Tenure Strategy)

Floor Plans:

EVH3-BPTW-T01-ZZ-DR-A-1006 rev C01 (Terrace 01 – GA Plans)
EVH3-BPTW-T02-ZZ-DR-A-1007 rev C02 (Terrace 02 and 04 – GA Plans)
EVH3-BPTW-T01-ZZ-DR-A-1008 rev C02 (Terrace 03 – GA Plans)
EVH3-BPTW-T05-ZZ-DR-A-1010 rev C01 (Terrace 05 and 08 – GA Plans)
EVH3-BPTW-T06-ZZ-DR-A-1011 rev C01 (Terrace 06 and 07 – GA Plans)

EVH3-BPTW-B01-ZZ-DR-A-1010 rev C04 (Ground and First Floor Plan)

EVH3-BPTW-B01-ZZ-DR-A-1011 rev C04 (Second and Third Floor Plan)
EVH3-BPTW-B01-04-DR-A-1015 rev C04 (Roof Plan)

Elevations:

EVH3-BPTW-T01-ZZ-DR-A-2006 rev C01 (Terrace 01 - Elevations)
EVH3-BPTW-T02-ZZ-DR-A-2007 rev C03 (Terrace 02 and 04 - Elevations)
EVH3-BPTW-T03-ZZ-DR-A-2008 rev C03 (Terrace 03 - Elevations)
EVH3-BPTW-T05-ZZ-DR-A-2010 rev C02 (Terrace 05 and 08 - Elevations)
EVH3-BPTW-T06-ZZ-DR-A-2011 rev C01 (Terrace 06 and 07 - Elevations)

EVH3-BPTW-B01-ZZ-SK-A-2010 rev C05 (Elevations - North and West)
EVH3-BPTW-B01-ZZ-SK-A-2011 rev C05 (Elevations – South and East)

Sections:

EVH3-BPTW-B01-ZZ-DR-A-2210 rev C04 (Sections)

Street Elevations:

EVH3-BPTW-ZZ-ZZ-DR-A-2201 rev C03 (Proposed Site Elevations)
EVH3-BPTW-ZZ-ZZ-DR-A-2202 rev C05 (Proposed Site Elevations)
EVH3-BPTW-ZZ-ZZ-DR-A-2203 rev C03 (Proposed Site Elevations)

Site Levels:

2401/04/7001 (Levels Strategy)
1803/05/0715 Rev A (Preliminary Levels)
1803/05/7019 (Preliminary Levels Sections)

Landscape Details:

10986-LD-PLN-280 rev P06 (Landscape Proposals General Arrangement)
10986-LD-PLN-281 rev P04 (Landscape Proposals Boundaries and Edges)
10986-LD-PLN-282 rev P04 (Landscape Proposals Sitewide Softworks)

Highway Details:

EVH3-BPTW-ZZ-00-ST-A-5600 rev C05 (Parking Strategy)
EVH3-BPTW-S01-00-ST-A-5900 rev C04 (Refuse Strategy)
EVH3-BPTW-S01-00-ST-A-6200 rev C04 (Cycle Strategy)
EVH3-BPTW-ZZ-00-ST-A-6700 rev C05 (Parking [Access] Strategy)
EVH3-BPTW-ZZ-00-ST-A-6800 rev C04 (Plot and Parking Strategy)

Other Details:

EVH3-BPTW-ZZ-00-ST-A-7100 rev C04 (Tenure Strategy)
EVH3-BPTW-ZZ-00-ST-A-6900 rev C04 (Materials Strategy)
332612492-100.8-1300-002 rev P01 (Proposed Street Lighting Layout)

Reason: For the avoidance of doubt and to ensure a satisfactory form of development and visual amenity in the locality.

Prior to Development Beyond Site Clearance and Demolition

- College Road Highway Works** - No part of the development hereby approved, except site clearance and demolition works, shall commence until a scheme of highway improvements within College Road has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include measures to: ensure accessibility from parking spaces for dwellings fronting College Road onto the public highway; restrain traffic speeds along College Road; retain clear passage for emergency vehicle and refuse vehicle access along the length of College Road.

Thereafter, prior to first occupation of any dwelling hereby approved the highway improvements shall be completed in full in accordance with a s.278 Agreement to be entered into with the Local Highway Authority.

Reason: In the interests of localised highway safety and accessibility as a continuation of the s.278 works secured in previous phases of the development and having account of the proposed layout of this phase of the development to accord with Policy CS11 of Gravesham Local Plan Core Strategy, Policies T1 and T5 of the Gravesham Borough Local Plan First Review and paragraphs 115 of the National Planning Policy Framework.

Informative : In a scenario where the construction of the Abacus Corner development under reference EDC/25/0104 does not precede this development, or is never constructed, the Local Highway Authority consider these works necessary to overcome their objection. It is expected that the scheme of highway improvements would be based on drawing 332410098-800.100 Revision P04 (appended to Stantec document 'KCC Response Technical Note 2') submitted under that application.

3. **College Road Visitor Parking Spaces** -No part of the development hereby approved, except site clearance and demolition works, shall commence until a scheme of highway works to provide 6no. visitor parking spaces within College Road has been submitted to and approved in writing by the Local Planning Authority. Thereafter, prior to first occupation of any dwelling hereby approved the approved scheme of visitor parking spaces shall be completed.

Reason: To provide visitor parking for the Harbour Village development that has high numbers of car free dwellings and in the interests of localised highway safety and accessibility as a continuation of the s.278 works secured in previous phases of the development and having account of the proposed layout of this phase of the development, to accord with Policy CS11 of Gravesham Local Plan Core Strategy, Policies T1 and T5 of the Gravesham Borough Local Plan First Review and paragraphs 115 of the National Planning Policy Framework.

Informative : In a scenario where the construction of the Abacus Corner development under reference EDC/25/0104 does not precede this development, or is never constructed, the Local Highway Authority consider the provision of the 6no. Visitor parking spaces detailed within the Abacus Corner planning application EDC/25/0104 within College Road are necessary to overcome their objection as those spaces are required to serve both that development and the Phase 3B development as very minimal visitor parking facilities have been provide within the private roads of the site in either proposal. Previous phases of Harbour Village cumulatively demonstrate very low visitor parking numbers also. The layout of these spaces within that proposal also serve as speed restraint within College Road and are precisely located to allow cars off driveways and emergency/refuse vehicle unobstructed access along College Road.

Prior to Installation of Underground Services

4. **Underground Services and Trees** - (a) No installation of underground services shall be carried out until a detailed plan of underground services, showing the relationship with trees within streets and open spaces and associated root barriers, below ground root cells and tree pits, together with details of the final layout and spacing of trees in relation to street lighting, has been submitted to and approved in writing by the Local Planning Authority. Tree species and sizes shall be informed by EDC's Public Realm Strategy guidance. The submitted details shall demonstrate that no conflicts will arise

between underground utilities and tree roots. Details and locations of root barriers, below ground root cells and tree pits shall clearly demonstrate that trees and cells have access to sufficient soil volumes and that trees have sufficient room to establish. Details of permeable paving surrounding the planters and the tree planting or details showing positive drainage into the root cells shall also be provided. There shall be no overall reduction in the number of trees when compared with the drawing 10986-LD-PLN-282 rev P04 (Landscape Proposals Sitewide Softworks), and any trees unable to be planted in the position indicated on the approved plans shall be relocated in the first instance within the same street or public space, and only when this is not possible should replacement trees be provided elsewhere on site. The development shall be carried out in accordance with the approved details.

(b) No installation of hard landscaping shall take place until photographic evidence of below ground tree root cells having been implemented in accordance with part (a) above has been submitted to and approved in writing by the Local Planning Authority.

Reason: To secure high-quality design and detailing and to ensure that materials will make an acceptable contextual response, resulting in the satisfactory appearance of the development in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and paragraphs 131 and 135 of the National Planning Policy Framework.

Prior to Development Above Foundation Level

5. **Architectural Detailing** - No development above foundation level shall take place until the following architectural details (including samples if requested) have been submitted to and approved in writing by the Local Planning Authority:

- (a) Brick detailing annotated on the approved drawings
- (b) Parapet capping
- (c) Entrance porches
- (d) Entrance canopies
- (e) Building name signage
- (f) Window reveals
- (g) Balconies including balustrades and finish to underside of the balcony platform

The development shall be constructed in accordance with the approved architectural details to be completed in full prior to first occupation of the building to which they relate.

Reason: To ensure that architectural features of buildings which are essential to distinctiveness of the development and satisfactory appearance of the development as a whole are assessed at a sufficiently early stage in the construction to enable their delivery in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and paragraphs 131 and 135 of National Planning Policy Framework.

6. **Materials** - No part of the development above foundation level shall commence until details and a schedule of all materials and products to be used externally, in accordance with the 'Materials Strategy' drawing EVH3-BPTW-ZZ-00-ST-A-6900 rev C04, have been submitted to and approved in writing by the Local Planning Authority. These shall include (but are not limited to):

- (a) Materials to be on the exposed faces of retaining walls;
- (b) Sample panel of all feature brickwork including mortar joint profile;
- (c) Sample of window/door types (including finishes, glass types and any manifestation); and

(d) Items which are fixed/integrated to the façade (i.e. fins/louvres, vent grilles, rainwater pipes, bird/bat boxes).

Samples of the above materials should be provided where requested by the Local Planning Authority. The development shall be carried out in accordance with the approved details and implemented in full prior to the first occupation of the dwelling to which they relate and shall thereafter be retained at all times.

Reason: To secure high-quality design and detailing and to ensure that materials will make an acceptable contextual response, resulting in the satisfactory appearance of the development in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and paragraphs 131 and 135 of the National Planning Policy Framework.

7. Planting Plans - No development above foundation level shall take place until a soft landscaping scheme based on drawing 10986-LD-PLN-282 rev P04 (Landscape Proposals Sitewide Softworks), but differentiating a 'Fastrack Frontage Residential Boundary' planting mix for the garden amenity area to the north of the apartment block, has been submitted to and approved in writing by the Local Planning Authority. Tree species and sizes shall be informed by EDC's Public Realm Strategy guidance. Soft landscape details shall include:

- (a) planting plans including plant schedules, noting species, plant sizes including girth and clear stem dimensions of trees and proposed numbers/densities where appropriate;
- (b) written specifications including cultivation and other operations associated with plant and grass establishment; and
- (c) coordination drawing of all biodiversity enhancements including habitats and items such as bird/bat boxes

Thereafter the approved soft landscaping scheme shall be carried out in full during the first available planting season following first occupation of any dwelling hereby approved.

The soft landscaping shall thereafter be managed and maintained in accordance with the Landscape and Ecological Management Plan (LEMP) to be approved for this phase of development pursuant to outline planning permission reference EDC/16/0004. Any trees, plants or grass that die, are damaged, removed or become diseased shall be replaced with a species of a similar size and species during the next available planting season.

Reason: To enhance the quality and appearance of the public realm and provide ecological and biodiversity enhancement in accordance with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy.

8. PV Panels - No development above foundation level shall take place until details of photovoltaic panels (PV) to be located on the roof of the apartment block and indicatively shown on drawing EVH3-BPTW-B01-04-DR-A-1015 rev C04 (Roof Plan) have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate how the PV panels accord with the energy generation indicated in section 3.7 of the 'Energy and Sustainability Statement' ref. 332612492 V2 (Stantec dated July 2025) and shall include their location, appearance, form and technical specification, and how they would be integrated into roof of the apartment. The PV panels shall be installed in accordance with the approved details prior to first occupation of the building to which they relate and shall thereafter be retained in working order at all times.

Reason: To ensure an acceptable standard of development and upon completion and implementation of on-site renewable energy generation, in accordance with adopted Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy.

9. **Biodiverse Brown Roof** - No development above foundation level shall take place until full details of the biodiverse brown roof shown indicatively on drawing EVH3-BPTW-B01-04-DR-A-1015 rev C04 (Roof Plan) for the apartment block has been submitted to and approved in writing by the Local Planning Authority. Details for the biodiverse brown roof shall include:

- (a) The size, location, appearance, and form;
- (b) Technical specification, including substrate depth, drainage layer, irrigation, and loading capacity;
- (c) Planting details, including species mix designed to deliver biodiversity benefits; and
- (d) Arrangements for management and maintenance across the lifetime of the development, including responsibilities and replacement strategy.

The biodiverse brown roof shall be installed in accordance with the approved details prior to the first use of the building to which it relates and shall thereafter be managed, maintained and retained at all times.

Reason: To ensure an acceptable standard of development and upon completion and implementation of on-site renewable energy generation and biodiversity enhancements, in accordance with adopted Gravesham Local Plan Core Strategy Policies CS12, CS18 and CS19.

10. **Street Lighting** - Notwithstanding the 'Proposed Street Lighting Layout' drawing (332612492-100.8-1300-002 rev P01) no development above foundation level shall take place until a revision of the street lighting scheme is submitted to and approved in writing with the Local Planning Authority providing details of a powder-coated finish of the street columns. The street lighting shall be installed in accordance with the approved details prior to the relevant road(s) first being brought into use by members of the public and shall thereafter be retained in working order at all times.

Reason: To ensure a satisfactory appearance to the development, in accordance with Gravesham Local Plan Core Strategy Policy CS19.

Informative: The use of a galvanised lighting column is not acceptable in this development. Street columns should be powder-coated.

11. **Cycle Storage (Houses)** - No development above foundation level shall take place until full details of the residential cycle storage facilities for the houses hereby approved have been submitted to and approved in writing by the Local Planning Authority. The details shall include the design, size and location of storage facilities and shall demonstrate compliance with the Ebbsfleet Sustainable Travel Strategy requirements for cycle storage, including:

- (a) A storage capacity to accommodate a minimum of 1 adult bicycle per bedroom within a dwelling;
- (b) External doors that are secured by mortice locks and not padlocks;

- (c) Shed cycle storage comprising tongue and groove construction, with minimum 18mm thickness, securely fixed to a concrete foundation and ground anchors provided; and
- (d) In the instance that cycle storage is provided within a separate shed, at least 1m2 storage space must be provided within the shed, for garden equipment etc, in addition to that provided for cycle parking.

The approved cycle storage facilities shall be constructed, furnished, and made available for use prior to the dwelling to which it relates being first occupied.

Reason: To ensure that the development meets the requirement for carbon reduction and renewable technology in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy.

12. Air Source Heat Pumps and Mechanical Ventilation Heat Recover Units - No development above foundation level shall take place until details of the air source heat pumps (including hot water pumps) and mechanical ventilation heat recovery units, in accordance with the 'Planning Condition 9b Acoustic Report' (Stantec, ref. 332612492 Rev 03, date September 2026), have been submitted to, and approved in writing by, the Local Planning Authority. Details shall include:

- (a) The model, technical specifications, quantum, location and appearance of the air source heat pumps, hot water pumps and mechanical ventilation heat recovery units to be installed; and
- (b) A noise impact assessment incorporating details of the finalised design, quantum and specification for air source heat pumps, hot water pumps and mechanical ventilation heat recovery units.

The development shall be carried out in accordance with the approved details and the air source heat pumps, hot water pumps and mechanical ventilation heat recovery units shall be installed prior to first occupation of the dwelling to which they relate.

Reason: To ensure the sustainable development, satisfactory appearance to the development, and in the interest of residential amenity of the future occupants from noise disturbance in accordance with Policy CS19 of the Local Plan Core Strategy

Informative: No ASHP or other mechanical heat units will be agreed to the front of dwellings or the side if they would be visible from the public realm.

Prior to First Occupation

13. Noise Mitigation - No dwelling hereby approved shall be occupied until the acoustic mitigation measures related to that building, as detailed within the 'Planning Condition 9b Acoustic Report' (Stantec, ref. 332612492 Rev 03, date September 2026), have been installed. The measures shall thereafter be retained and maintained in full working order at all times.

Reason: In order to protect residential amenity of the future occupants from industrial noise and in order to protect the commercial viability of safeguarded wharves, in accordance with Policy CS19 of the Local Plan Core Strategy and Policy DM8 of the Kent Minerals and Waste Local Plan.

14. **Visibility Splays** - No dwelling hereby approved shall be occupied until the pedestrian and vehicle visibility splays shown on drawing 332410098_300.100_104 Revision P04 (appended to Stantec document 'KCC Response Technical Note 2') and the forward visibility splay at the crossroads, shown on plan 332410098_300.100_104 Revision P04 (appended to Stantec document 'KCC Response Technical Note 2'), crossing third-party land identified as Plot 018 on drawing EVH3-BPTW-ZZ-00-ST-A-6800 rev C04 (Plot and Parking), have been provided and shall thereafter be maintained with no obstruction exceeding 0.6 metres in height within the pedestrian splays and no obstruction exceeding 1.05 metres in height within the vehicle splays and forward visibility splay.

Reason - In the interest of highway and pedestrian safety, in accordance with adopted Policy CS11 of the Gravesham Local Plan Core Strategy and Local Plan First Review Saved Policy T5

15. **Plot 3 (Bollard)** - The approved end-of-terrace dwelling fronting College Road, shown as Plot 003 on drawing EVH3-BPTW-ZZ-00-ST-A-6800 rev C04 (Plot and Parking), shall not be occupied until a bollard has been installed on the pedestrian link to College Road, adjacent to the driveway for Plot 003, to prevent vehicles parking on that driveway from parking on or overhanging the pedestrian link route. The bollard shall thereafter be retained in place at all times.

Reason - In the interest of highway and pedestrian safety, in accordance with adopted Policy CS11 of the Gravesham Local Plan Core Strategy and Local Plan First Review Saved Policy T5.

16. **Cycle Parking (Apartment and visitor)** – No dwelling within the apartment block hereby approved shall be occupied until the communal cycle parking and northern area of visitor cycle parking (4no. Sheffield stands), as shown on drawing EVH3-BPTW-S01-00-ST-A-6200 Rev C04 (Cycle Strategy), have been installed and made available for use. The southern area of visitor cycle parking (3no. Sheffield stands), as shown on drawing EVH3-BPTW-S01-00-ST-A-6200 Rev C04 (Cycle Strategy), shall be installed and made available for use prior to the first occupation of Plot 018 as identified on drawing EVH3-BPTW-ZZ-00-ST-A-6800 rev C04 (Plot and Parking). The cycle parking shall thereafter be maintained and kept available for use at all times.

Reason: To ensure that the development meets the requirement for carbon reduction and renewable technology in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy.

17. **Provision and Retention of Parking** – No dwelling hereby approved shall be occupied until the related vehicle parking and turning areas which relate to it, as shown on the 'Parking Strategy' plan (EVH3-BPTW-ZZ-00-ST-A-5600 rev C05), have been provided and are available for use, including final surfacing, drainage and demarcation. Visitor spaces shall be clearly demarcated as such and shall remain unallocated at all times. Notwithstanding the provisions of the Town and Country (General Permitted Development) (England) Order 2015 (as amended), or any provision equivalent to it in any statutory instrument revoking and re-enacting that Order, no development shall be carried out on the site in such a manner or in such a position as to preclude the use of or access to the approved vehicle parking and turning areas.

Reason: To ensure sufficient off-street car parking provision to serve the development, in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy and saved Local Plan First Review Policy P3

18. Parking Management Plan - No dwelling hereby approved shall be occupied until a detailed Parking Management Plan for Phase 3B has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include, but not be limited to:

- (a) Details of how all parking spaces will be managed including information related to any Traffic Regulation Orders, private parking management, permit systems, time limits and enforcement hours;
- (b) How the allocation of parking permits within the site will operate;
- (c) How visitor parking within the site will operate;
- (d) How cycle parking facilities will operate (resident and visitors);
- (e) How the allocation of the M4(2) specialist parking spaces will operate;
- (f) Details of how inappropriate parking outside of designated bays will be prevented (with reference to the Parking Restrictions Plan Double Yellow Lines 332410098_300.100_106 Revision P02 contained within Appendix A of TN001 Rev B, dated 19th June 2025);
- (g) Details of the monitoring methodology;
- (h) Details of arrangements for the management and maintenance of electric vehicle charging points;
- (i) Details of parking controls to prevent indiscriminate and nuisance parking outside of designated bays, such as parking on the pavements or landscaped verges, or causing obstruction to pedestrians along footpaths;
- (j) Details of private parking enforcement operation to prevent on street parking outside of designated bays and permitted duration within visitor bays;
- (k) Details of arrangements should the management company go into administration; and
- (l) Details of how future purchasers will be made aware of parking management regime on the site, the allocation of spaces, the availability of car club and one year's free membership per household for the first occupation of a dwelling, the potential introduction of a Controlled Parking Zone within surrounding public highway (which will not issue parking permits to Harbour Village addresses), as part of purchase of this development including how this will be communicated through the marketing process.

The development shall thereafter be carried out in accordance with the approved Parking Management Plan and the approved parking controls and enforcement shall be operational from the first residential occupation and shall thereafter be maintained in perpetuity.

Reason: To ensure adequate management arrangements for residential and visitor car parking, the free flow of traffic on the highway, and to encourage sustainable travel in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy and saved Local Plan First Review Policy P3.

19. Highway Management Plan - No dwelling hereby approved shall be occupied until a Highway Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Highway Management Plan shall include details of the management and maintenance arrangements for all components of the highway including the carriageway, footpaths, verges/landscaping, street lighting and any other street furniture. The Plan shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the Plan will be secured by the developer with the management body responsible for its delivery. The approved Plan shall be implemented in accordance with the approved details.

Reason: To ensure adequate management arrangements for private highways, verges and street lighting, to ensure the free flow of traffic on the highway, and to encourage

sustainable travel in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy and saved Local Plan First Review Policy P3.

20. **Hard Landscaping/Boundaries and Edges** - No dwelling hereby approved shall be occupied until the hard surfacing, boundary treatment and kerbs/edging in building/street/public realm that serves it has been completed in accordance with the approved details in drawings 10986-LD-PLN-280 rev P06 (Landscape Proposals General Arrangement) and 10986-LD-PLN-281 rev P04 (Landscape Proposals Boundaries and Edges). The installed hard surfacing and kerbs/edging shall thereafter be retained at all times.

Reason: To enhance the quality and appearance of the public realm in accordance in accordance with Gravesham Local Plan Core Strategy Policy CS19.

Informative – No submitted plans detail the finish of the exposed faces of the various retaining walls in the Phase through this site and as such these details remain for agreement by condition 4.

21. **Carbon Reduction Measures** - The development hereby approved shall incorporate the carbon reduction measures specified within Section 3 of the Energy and Sustainability Statement (ref. 332612492 V2, July 2025). These measures shall be implemented in full prior to first occupation of the dwelling to which they relate and shall thereafter be retained and maintained in good working order throughout the lifetime of the development.

Reason: To ensure that the development meets the requirement for carbon reduction and renewable technology in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy.

22. **Additional Sustainability Credentials** - The development hereby permitted shall be carried out in accordance with the 'Additional Sustainability Credentials' commitments and targets set out at section 4.4 of the 'Energy and Sustainability Statement' V2 (Stantec, dated July 2025).

Reason: To ensure that the development meets the requirement for carbon reduction and renewable technology in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy and Policy CSW3 of Kent Minerals and Waste Local Plan 2024 – 2039.

23. **Ecological Enhancement** - The ecological enhancement measures shown on Figure 1 rev A - Annotated Site Plan within the Phase 3B Ecological Mitigation and Enhancement Strategy Revision A (ref. 193252 dated September 2025) shall be installed within the building or open area within which they are located, prior to the first occupation or use of that building or space, in accordance with approved details. The installed measures shall thereafter be maintained and retained at all times.

Reason: To ensure delivery of ecological and biodiversity mitigation and enhancement in accordance with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy and paragraph 187 of the National Planning Policy Framework (NPPF)

24. **EV Charging** - The electric vehicle charging facilities shown on the Parking Strategy drawing EVH3-BPTW-ZZ-00-ST-A-5600 rev C05 shall be installed prior to first use of the parking space(s) to which it/they relate and shall be retained in working order at all times.

Reason: In order to encourage sustainable travel and protect amenity, in accordance with Policies CS11 and CS19 of the Gravesham Local Plan Core Strategy and paragraph 112 of National Planning Policy Framework.

Informative – Details of arrangements for the management and maintenance of electric vehicle charging points are required within the Parking Management Plan condition and the drawing shows the equipment to be compliant with the KCC Highway officer's requirements.

Compliance

25. **Water Efficiency** - All dwellings hereby approved shall meet Building Regulations Part G optional requirement for water efficiency of 110 litres per person per day. The water efficiency measures to achieve this, including provision for flow restrictors and use of water efficient appliances, as set out in Section 4 of the Energy and Sustainability Statement (ref. 332612492 V2, July 2025) shall be implemented in full prior to first occupation of the dwelling to which they relate.

Reason: To accord with the terms of the application and support the sustainable surface water drainage system, in accordance with adopted Gravesham Local Plan Core Strategy Policy CS18.

26. **Finished Floor Level** - Notwithstanding condition 46 of outline planning permission ref. EDC/16/0004, the Finished Floor Levels for the buildings hereby approved shall accord with the levels shown on drawing 2401/04/7001 (Levels Strategy) and no buildings hereby approved shall be constructed with any threshold or floor level below 8.0m Above Ordnance Datum (AOD).

Reason: To minimise the risk of flooding. In line with paragraphs 170, and 181 of the National Planning Policy Framework (NPPF) and Policy CS18 of the Gravesham Local Plan Core Strategy.

27. **M4(2) Compliant Dwellings** - The dwellings identified as M4(2) accessible and adaptable dwellings on drawing EVH3-BPTW-ZZ-00-M2-A-7100 rev C04 (Tenure Strategy) hereby approved shall be designed and constructed in accordance with the optional Building Regulations Part M4(2) standard.

Reason: To ensure the provision of accessible and adaptable dwellings, in accordance with adopted Gravesham Local Plan Core Strategy Policy CS1.

28. **Removal Permitted Development Rights (Houses)** - Notwithstanding the provisions of Article 3, Part 1 Classes A, B, D, G and H of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or in any equivalent Class in any Order revoking or re-enacting that Order, no additional window, door or other form of opening other than those shown on the approved drawings shall be formed, no addition or alteration to the roof or the construction of a porch outside any external door, nor installation of any satellite dishes or other microwave antenna, chimney, flue or soil and vent pipe, shall be carried out without the prior written permission of the Local Planning Authority having first been obtained.

Reason - To safeguard neighbouring amenity and maintain a good standard of design and private external amenity areas, in accordance with adopted Gravesham Local Plan Core Strategy Policy CS19

29. **Removal Permitted Development Rights (Houses)** - Notwithstanding the provisions of Article 3, Part 1 Class F, and Part 2 Classes A and B of Schedule 2 to the Town and

Country Planning (General Permitted Development) (England) Order 2015 (as amended), or in any equivalent Class in any Order revoking or re-enacting that Order, no additional hard surface for the purpose of parking a motor car, no additional means of access to a highway and no erection, construction or alteration to a gate, fence or other means of enclosure, shall be carried out without the prior written permission of the Local Planning Authority having first been obtained.

Reason - In order to maintain a good standard of design and amenity, to maintain the character of the development and to ensure the proper planning of the area in accordance with adopted Gravesham Local Plan Core Strategy Policy CS19.

INFORMATIVES

1. ADDITIONAL DOCUMENTS

The following documents have been considered in the assessment of this application:

- Planning Statement (Savills, May 2023)
- Planning Statement Addendum (Savills, July 2025)
- Design and Access Statement (Rev 03), (BPTW, June 2025)
- Design and Access Statement Addendum Document (BPTW, dated October 2025)
- EVH3-BPTW-ZZ-ZZ-ST-A-0020 rev C01 (Existing Site Plan)
- Access and Parking Technical Note (Stantec, ref: TN001 Rev B, dated 19th June 2025)
- Stage 1 Road Safety Audit (RSC Ltd, ref: RSC/EB/KS/24162, dated 22/07/2025)
- KCC Response Technical Note (Stantec, dated 19th September 2025)
- KCC Response Technical Note 2 (Stantec, dated 24th October 2025)
- 1803/05/1105 (Bus Road West Adoption Plan)
- Illustrative Planting Schedule (LUC, ref: 10986-LD-SCH-830 Rev P03)
- Arboricultural Implications Report (SJA Trees, ref SJA air 23167-01, dated May 2023)
- Ecological Mitigation and Enhancement Strategy (AAe, REF: 193252 Rev A, September 2025)
- Acoustic Report (Stantec, Rev 03, dated September 2025)
- Technical Note (Noise) (Stantec, dated 6 November 2025)
- Plot Schedule Rev C04 (BPTW, ref: EHV3-BPTW-XX-XX-SA-A-0101 rev C04, dated 23.10.2025)
- Accommodation Schedule Rev C03 (BPTW, ref: EHV3-BPTW-XX-XX-SA-A-0102 rev C03, dated 23.10.2025)
- Affordable Housing Scheme (Updated) (Savills, Dated May 2023)
- Copy Decision Notice EDC/21/0053 (Condition 20 – Site Wide Archaeology)
- Written Scheme of Investigation for Archaeological Excavation (Wessex Archaeology, ref 232994.1, dated December 2022)
- Archaeology Letter (RPS, ref RvKM JAC25622, dated May 2023)
- Phase 3A/3B Historic Building Recording Works (RPS, dated 05/05/23)
- 232994 – Northfleet – SMS –Site Plan Overview (Wessex Archaeology, dated 04/05/2023)
- 232994 – Northfleet – SMS –Site Phase 3A sheets 1 – 4 (Wessex Archaeology, dated 04/05/2023)
- 232994 – Northfleet – SMS –Site Phase 3B (Wessex Archaeology, dated 04/05/2023)
- 1803/05/3002 (Section 104 Layout [Drainage], RLT)
- Outline Fire Strategy (Robson Frankham, rev 01, dated 12/05/2023)
- Fire Statement (Robson Frankham, rev 1, dated 12/05/2023)
- Air Quality Technical Note (Stantec, ref AQ03_Rev4, dated June 2025)
- Daylight and Sunlight Report (eb7, ref: 6024, dated 10 June 2025)
- Energy and Sustainability Statement V2 (Stantec, dated July 2025)
- Flood Risk Assessment (RLT, ref: 180305H-FRA, dated 9th July 2025)

- Infrastructure Assessment (Stantec, ref: 332410098/300.500 Rev. A, dated June 2025)
- Outdoor Lighting Report (Stantec, dated 17 June 2025)
- Overheating Assessment V1 (Stantec, dated July 2025)
- Utilities Assessment (Stantec, ref: R888, dated May 2023)
- Statement of Community Involvement May 2023 (The Terrapin Group)
- Cover Letter (Savills, dated 14 July 2025)

2. OUTLINE PLANNING PERMISSION

The applicant is reminded that this decision is an approval of reserved matters pursuant to an outline planning permission and that the conditions attached to the outline planning permission also have to be complied with.

For the avoidance of doubt, this reserved matters approval provides information required under conditions 2, 9, 11 and 15 of outline planning permission EDC/16/0004 subject to any relevant conditions set out in this decision notice. This approval does not however have the effect of discharging any other conditions imposed on the outline planning permission.

3. DEVIATION FROM APPROVED PLANS

It is possible that any proposed deviation from the approved plans could be classed as a 'material' change requiring a further application/permission. In the event that any change is proposed, applicants are advised to seek advice from the Local Planning Authority as proceeding without the necessary permissions could nullify this permission.

4. BUILDING REGULATIONS AND OTHER CONSENTS

This decision does not imply any consent which may be required under the Building Regulations or under any other enactment or provision. Nor does it override any private rights which any person may have relating to the land affected by this decision, including the provisions of the Party Wall Act 1996 etc.

5. KCC ECOLOGY

Street lighting – it is recommended that the lighting follows the KCC highways dimming regime (regardless of whether it is adopted or not). Residential roads typically are on a minus 40/60% dimming regime so dim by 40% between the hours of 20:00 – 22:00 and then dim by minus 60% between the hours of 22:00 to 05:00.

6. LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

The soft landscaping shall be maintained in accordance with the Landscape and Ecological Management Plan (LEMP) to be approved pursuant to the outline planning permission.

7. FLOOD RESISTANCE AND RESILIENCE MEASURES

The Environment Agency recommend flood resistance and resilient measures are utilised in the build.

8. KCC HIGHWAYS

It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway. Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

9. NAMING AND NUMBERING (GBC)

As a result of the development, it appears that a change has to be made to the national property gazetteer. It is a legal requirement that a property or premises is registered.

The Naming and Numbering Certificate, when issued, will reduce location or delivery problems via Royal Mail or other carriers, and importantly for the Police, Ambulance, and Fire & Rescue services. Registration is also necessary to register to vote, for utility connections, and will avoid duplicate addresses. The Naming and Numbering service is provided by the Borough Council. Further information is available from the following page of the council's website:

<https://www.gravesham.gov.uk/home/planning-and-building/street-naming-and-numbering-register/overview>.

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It should be noted that the Heritage Management Plan approved pursuant to the outline planning permission includes a commitment by the developer to engagement with local residents/groups to inform a strategy for street naming at the application site.

10. POSITIVE AND CREATIVE APPROACH TO DECISION MAKING

In accordance with paragraph 39 of the National Planning Policy Framework, Ebbsfleet Development Corporation, as local planning authority, has taken a positive and creative approach to the proposed development, focusing on finding solutions.

The applicant/agent was provided with pre-application advice and was advised of planning issues during the processing of the application and additional information has been submitted to address these. The application was determined within the relevant timescales agreed through an extension of time.

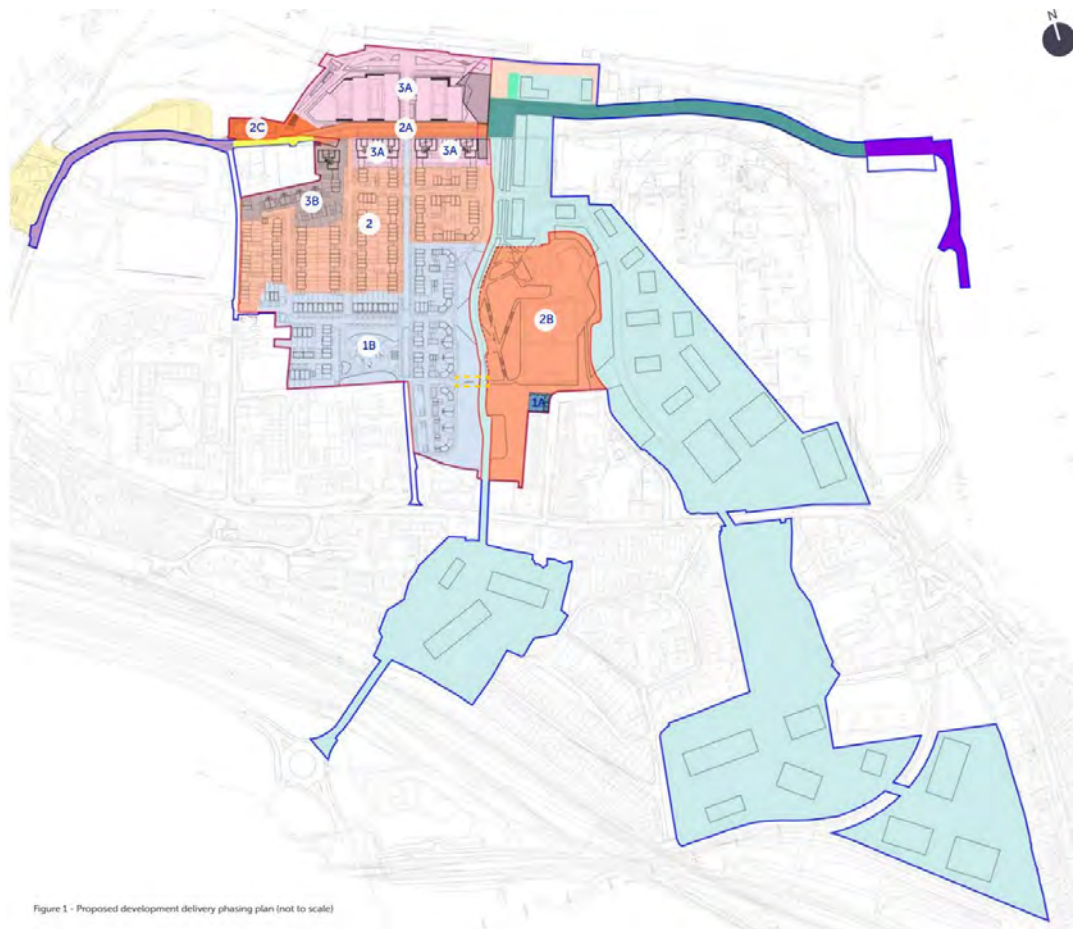
1.0 SITE CONTEXT AND PROPOSAL

Site Context

- 1.1 This application relates to the part of the Northfleet Riverside strategic development area, as identified in the Ebbsfleet Implementation Framework, known as Northfleet Embankment West. Northfleet Embankment West comprises the former Northfleet Cement Works which ceased operation in December 2008. Demolition of the majority of the buildings and structures was completed in 2010. The whole site covers approximately 31 hectares in area and includes Church Path Pit and Vineyard Pit located to the south and connected to the main site by road tunnels. Northfleet Embankment West includes 12 hectares of residential land to the west of the site and 19 hectares of employment land to the east and south.
- 1.2 The wide scale excavation of cement and lime works between the River Thames and Northfleet High Street led to significant topographical changes in the area. The upper levels of land are 20m to 30m above the lower land levels, demarcated by cliffs and slopes.
- 1.3 Within the wider Northfleet Riverside area heavy industry and employment operations take place including manufacturing, a tissue paper mill, aggregates import, a builder's yard, together with some vacant plots. There are two wharves within the wider Northfleet Riverside area safeguarded by the Kent Minerals and Waste Local Plan for their minerals function and the waterfront is formed of man-made flood protection walls. Commercial operations take place at 42 Wharf located at the eastern end, which is operated by Tarmac to serve their existing Bulk Powders Import Terminal and will also serve their approved Bulk Aggregates Import Terminal. Robins Wharf lies at the western end adjacent to where the River Ebbsfleet enters the River Thames via Robin's Creek. The redundant Bevans Wharf, adjacent to the phase of development being considered in the application, is no longer operational and is not safeguarded.
- 1.4 The Northfleet Riverside area contains one listed building, which is the Grade II Listed Bevans War Memorial located adjacent to the remaining office building. The Grade II Listed Northfleet Lower Lighthouse is located on 42 Wharf that fronts the application site.
- 1.5 The wider settlement of Northfleet is located to the southeast of the site, where the land use is predominantly residential but also with some commercial uses, including shops and services and other local facilities, including a primary school. The North Kent Line passes close to the site and Northfleet Station is located south of Northfleet High Street. Ebbsfleet International and Domestic Stations are also nearby, approximately 0.5km to the south of the North Kent Line.

1.6 There are a number of Public Rights of Way traversing the Northfleet Riverside area. Public footpaths NU3, NU6, NU42 and NU7 run through the Northfleet Embankment West development site with NU6 forming part of the King Charles III England Coast Path running adjacent to the River Thames.

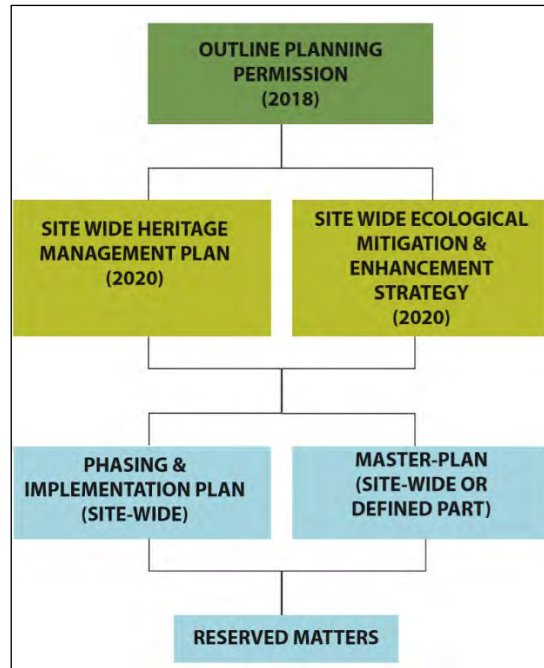
1.7 The image below shows the Northfleet Embankment West site in its wider context:



Planning Background

1.8 Outline planning permission (reference EDC/16/0004) with all matters reserved was granted in June 2018 for a mixed-use development comprising up to 532 residential dwellings, 46,000sqm of employment floorspace, a neighbourhood centre with retail units, a community centre and riverside pubs and restaurants (the OPP). The permission was accompanied by a s.106 Agreement. The land was subsequently sold and is now in dual ownership. The land approved for residential development was purchased by Bellway Homes in early 2020 and the remaining employment land is owned by Northfleet Property LLP which was acquired by NWM Investments.

1.9 The outline planning permission is tiered and required approval of particular documents prior to being able to move onto the next stage. The structure of the outline permission is shown below.



Structure of the Outline Planning Permission

- 1.10 A Heritage Management Plan and an Ecological Mitigation and Enhancement Strategy were approved in April 2020 and May 2020 respectively.
- 1.11 A detailed residential masterplan was approved in December 2020 and provides a comprehensive set of design parameters for the residential land. The parameters include different character areas to ensure a locally distinctive development, reinforcing local character and heritage, and a high-quality framework against which future reserved matters applications are to be assessed. It also carried forward from the outline planning permission commitments in respect of sustainable building design including incorporation of green/brown roofs on some buildings, electric vehicle charging (active and passive) across the whole scheme, sustainable drainage, water reduction and small-scale renewable energy generation.
- 1.12 A non-material amendment was approved to amend the wording of condition 7 of the outline planning permission, in August 2019, to allow for reserved matters approval to be granted on parts of the site in advance of approval of a site-wide detailed Phasing and Implementation Plan. The proposed change has the effect of allowing reserved matters approval to be granted for 124 of the 532 dwellings approved by the outline planning permission on the wider site and has approval/delivery of standalone infrastructure including Bevans Park, the SUDs park and the Fastrack bus corridor.
- 1.13 Following the non-material amendment to condition 7, Reserved Matters applications were approved for Phase 1A for 3 dwellings in December 2020, Phase 1B for 121 dwellings in November 2021, Phase 2C for SUDs and public realm in December 2022, Bevans Park Bridge in March 2023, Phase 2 for 130 dwellings in July 2023, Bevans Park in September 2023 and Phase 3A for 273 dwellings in December 2024. In addition, a standalone full planning permission was granted in February 2023 for an additional 3 dwellings adjacent to Phase 1B.
- 1.14 A non-material amendment was also approved in May 2023 to amend the wording of condition 5a to increase the maximum number of residential units from 532 to 567 and increase the size of the community use floorspace to a minimum of 250sqm.

- 1.15 The site-wide Phasing and Implementation Plan was approved in June 2023. This sets out a programme for delivery of residential, employment and other floorspace, open space and the provision of infrastructure required to support the development to ensure that the development proceeds in an orderly and balanced manner in respect of both the location of and mix of development.
- 1.16 In respect to the Phase 3A development, the Phasing and Implementation Plan requires the delivery of the Riverside Promenade, which is located within Phase 3A, prior to the first occupation of the 100th residential unit within Phase 3A and the provision and adoption of the western section of the Public Right of Way NU6 following the promenade's completion. (The S106 requires the incorporation also of a permissive cycle way through the promenade.) The section of the Bus Road West that falls within the application boundary must also be completed and available for use prior to the occupation of the 100th residential unit within Phase 3A with a later trigger for the delivery of Bus Road East – prior to the occupation of the 500th residential unit within the OPP area.
- 1.17 Alongside the Phase 3A application Reserved Matters application was also submitted the current Phase 3B RM proposal, as well as for the employment land at the Triangle site, Vineyard Pit and Church Path Pit and the Bus Road West and Granby Road sections of the Fastrack route. Planning permission has recently been granted for the employment land and Bus Road West. Whilst the Phase 3A application was progressed to determination in 2024 this Phase 3B application was held in abeyance while redesign was undertaken.
- 1.18 The deadline for submission of Reserved Matters applications against the outline planning permission has now passed. No Reserved Matters application has been received for the riverside part of the Northfleet Embankment West site, to the east of Phase 3A, identified to provide mixed-use retail/office/food space around a plaza and as such the planning permission for that area has now expired.
- 1.19 Alongside the Reserved Matters applications, full planning permission was also granted in July 2021 for the formation of a development platform across the Northfleet Embankment West site, comprising the land benefitting from outline planning permission for residential and employment development, and earthworks for the future residential development have been completed under this stand-alone permission.
- 1.20 Additionally, there are currently live applications held by EDC as Local Planning Authority for: a Non-Material Amendment (NMA) to the Phase 1A site to change the parameter plans under the outline permission EDC/16/0004 from residential land to employment land; a full planning application (joint with Gravesham Borough Council) for a workshop on the site which under the EDC/16/0004 outline permission is known as Phase 1A land; and, a full planning application on the adjacent site to the current Phase 3B application site, referred to as the Abacus Corner application, for residential-led development and which would be reliant in its layout and access on the Phase 3B proposal being delivered.

Application Site – Residential Phase 3B

- 1.21 Phase 3B is located within the northwestern area of the approved residential part of the OPP EDC/16/0004, which has the development name of 'Harbour Village'. The application site comprises an area of approximately 0.6 hectares with a development platform in place following the previous agreement under application EDC/20/0147. The site is cleared of buildings and vegetation other than some self-seeded vegetation

around its northern and western boundaries to the Abacus Corner employment site and with College Road to the west.

- 1.22 The northern boundary of the site is staggered and on its western side abuts the existing employment area, known as Abacus Corner, and on its eastern side it abuts part of the Fastrack bus route running east to west through Harbour Village. The approved Phase 2 site is located to its southern and eastern sides and the approved Phase 3A site also to its eastern side on the opposite side of the road. To the west of the site runs College Road, beyond which is the commercial operation by WE Roberts Ltd, who operate an unrestricted B2 manufacturing use.
- 1.23 The OPP Fastrack route runs to the north of the Abacus Corner existing employment site and part of the application site, and to the north of the Fastrack route is located the approved SUDS park. Whilst the drainage function of that development has commenced and is serving the Harbour Village development, the public park aspect of the development has not yet been delivered.
- 1.24 The main access to Phase 3B is proposed via a new road branching west off the extension of Hive Lane, which runs through Phases 2 and 1B and is itself accessed from Northfleet High Street. Access to the courtyard car park of the proposed apartment block would be gained via a crossover access from the Hive Lane extension road in Phase 2.



(Source – Design and Access Statement)

- 1.25 Located further to the eastern and western sides of the site lie operating commercial sites and safeguarded wharfs. To the southeast, connected by a pedestrian/cycle bridge (planning permission approved) from Phase 1B, lies a prominent escarpment which is the location for a heritage park (Bevan's Park) public open space to serve both existing and future residents. The local primary school in Factory Road/Lawn Road would be accessed through the heritage park.

- 1.26 The site falls almost entirely within Flood Zone 1 as shown on the Environment Agency Flood Map and just a very small part of the northern boundary of the site within Flood Zone 3. The site also sits within Groundwater Source Protection Zone 2 (Outer Protection Zone). Some land raising has already taken place on the site as part of the creation of the development platform under planning permission EDC/20/0147.

Proposal

- 1.27 This application seeks approval of reserved matters including details of access, layout, scale, appearance, and landscaping for 39no. dwellings comprising 18no. houses and 21no. apartments. 9no. of the dwellings would be delivered as affordable housing. The proposal includes associated highway infrastructure, parking and servicing.
- 1.28 This reserved matters application is submitted pursuant to the parameter plans approved in the outline planning permission and the approved detailed residential masterplan. The proposal includes a four-storey apartment block as well as 2 and 3 bed roomed detached, semi-detached and terraced house types across the scheme.
- 1.29 The proposals would provide the following accommodation:

Dwelling Type	Size	No.	Affordable Housing
Apartments:	1 bed 2 person	8	3 SO
	2 bed 4 person	13	4 SO 2 AR
Houses:	3 bed 4 person	2	
	3 bed 5 person	4	
	3 bed 6 person	12	
TOTAL:		39	9 (23%)

- 1.30 The outline planning permission has conditions imposed that require submission of additional details alongside reserved matters applications. This application seeks to discharge condition 9 for finished floor levels, noise attenuation measures, ecological mitigation and enhancement, and open spaces within the phase, condition 11 for sustainability measures and condition 15 related to public spaces, public art and heritage interpretation.
- 1.31 It is also relevant to note that the site overlaps with the site boundary for the Abacus Corner full planning application EDC/25/0104. The applicant explains that this overlap is to follow residential plot boundaries within Harbour Village Phase 3B to assist in conveyancing. Within this Phase 3B RM application (EDC/23/0078) the overlapped area has been left bare of development so no conflict of the proposed development with the proposed Abacus Corner development would occur. The Phase 3B proposed layout is shown below for clarity with the highlighted areas being the overlap areas with the Abacus Corner proposal.



(Source: EDC/23/0078 - Phase 3B Landscape GA plan)

- 1.32 This application is interdependent with application EDC/25/0104 (Abacus Corner) in relation to: the two site boundaries materially overlap; access for vehicles, pedestrians and cyclists from Phase 2 to the western part of the Abacus Corner development travel through this site using infrastructure only provided within this site boundary; highway works within College Road provide highway safety and manoeuvring measures required for both developments; the College Road layout of visitor parking spaces and yellow lines, proposed under the Abacus Corner application, intrinsically relate to the development layout (parking spaces for the house fronting College Road) proposed under this proposal; KCC Highways advise both developments would depend on the visitor parking spaces being provided within College Road proposed under the Abacus Corner application; car parking allocation and adapted cycle spaces are provided for these developments cross boundary.

2.0 RELEVANT PLANNING HISTORY

Wider Northfleet Embankment West Site – Outline Planning Permission

- 2.1 EDC/16/0004 - Outline application with all matters reserved for a mixed development including up to 532 dwellings and up to 46,000 sq. m employment floorspace. Approved by EDC on 8th June 2018.
- 2.2 EDC/25/0035 - Non-material amendment to Condition 4 of Outline Planning Permission EDC/16/0004 to amend the land uses illustrated on the parameter plans. Under consideration (Amend parameter plan of the O/L from residential land to employment land at Phase 1A)

Phasing and Implementation Plan

- 2.3 EDC/19/0124 - Application for non-material amendments to **conditions 7 and 8** of outline planning permission reference no. EDC/16/0004 to allow submission of the Phasing and Implementation Plan and Detailed Masterplan for approval either prior to or at the same time as submission of the first Reserved Matters application. Approved 8th August 2019.

- 2.4 EDC/20/0079 - Application for the discharge of **condition 7** attached to outline planning permission reference no. EDC/16/0004 relating to a detailed Phasing and Implementation Plan. Approved by EDC on 29th June 2023.

Residential Masterplan

- 2.5 EDC/20/0080 - Application for the partial **discharge of condition 8** attached to outline planning permission reference no. EDC/16/0004 relating to a detailed Masterplan for the residential land. Approved by EDC on 17th December 2020.

Reserved Matters – Residential land

- 2.6 EDC/20/0076 - Application for approval of reserved matters (relating to access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land at Factory Road (**Phase 1A**) comprising the erection of 3no. dwellings together with associated infrastructure. Approved by EDC on 18th December 2021
- 2.7 EDC/21/0081 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land north of Hive Lane (**Phase 1B**) comprising the erection of 121no. dwellings together with associated infrastructure. Approved 7 January 2022
- 2.8 EDC/21/0206 - Reserved matters pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land north and east of College Road (**Phase 2C**) to create a Sustainable Urban Drainage System and associated public realm. Approved on 21st December 2022.
- 2.9 EDC/22/0058 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land east of College Road (**Phase 2**) comprising the erection of 130no. dwellings together with associated infrastructure. Approved on 31st July 2023.
- 2.10 EDC/22/0120 – Construction of a Pedestrian/Cycle Bridge over the highway (Bevans Park Bridge). Approved by EDC on 23rd March 2023
- 2.11 EDC/23/0086 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of outline planning permission reference no. EDC/16/0004 for land north east of College Road (Phase 3A) comprising the erection of 273 no. dwellings together with associated infrastructure. Approved by EDC on 16th December 2024 subject to S106

Wider Northfleet Embankment West Site – Development Platform

- 2.12 EDC/20/0147 - Formation of a **development platform** (residential and employment) comprising excavation and infilling of the site, including access roads - Approved by EDC on 7th July 2021

Other Relevant Applications

- 2.13 EDC/25/0104 - Abacus Corner, Land East Of College Road And South Of The Creek Northfleet - 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 - Under consideration

3.0 PUBLICITY AND REPRESENTATIONS

- 3.1 The application was publicised in the Ebbsfleet Development Corporation (EDC) weekly list.
- 3.2 Neighbour notification letters were sent to local addresses as well as adjoining major landowners Aggregate Industries (Holcim) and Brett Industries (last neighbour consultation expiry date 23 Oct 2025).
- 3.3 The proposals were also advertised on site via notices and publication in a local newspaper due to comprising major development.
- 3.4 Site Notice expiry date: 04 August 2023
- 3.5 Press Notice expiry date: 10 August 2023
- 3.6 2no. written representations from the neighbouring commercial operators Brett Aggregates and Holcim have been received for this application. These neighbouring operators instructed their own specialist acoustic consultant WBM Acoustic Consultants (latest comments received 9 October 2025.) Initially 5no. points of objection to the proposal were raised but following the submission of a revised NIA four of those five objections have been withdrawn. In respect to the final objection the neighbour's consultant advises that additional information is required in respect to the presented rating levels and queried if they include all of the cumulative noise scenarios of the various surrounding operators. They request that this additional information is provided.

EDC Officer Comment: The applicant has confirmed that the cumulative noise scenarios raised by WBM are a correct understanding. This confirmation has been uploaded to the public file and 'Objection 2' is therefore considered by the LPA to be withdrawn.

4.0 CONSULTATION RESPONSES

- 4.1 The following organisations were consulted on both the original and revised application and the most recent responses are summarised below:
- 4.2 LPA Noise Consultant (Bureau Veritas)

Received 10 October 2025 – FULLY SATISFIES REQUIREMENTS

The revised Noise Impact Assessment considers and resolves comments raised in respect to the original submission. The NIA demonstrates suitable amenity is provided to future residents, and noise impacts therefore do not provide sufficient basis for the development to be refused. They also comment whilst it is disappointing that the applicant has not capitalised upon the opportunity to create public areas below the 55dBA limit within the scheme (or provide mitigation measures to balconies in the event they are used for relaxation), it is not considered that this is sufficient basis to recommend refusal of the scheme.

EDC Officer Comment: Conditions are required to secure the mitigation measures for internal noise environment.

4.3 LPA Lighting Consultant (Bureau Veritas)

Received 15 August 2025 – NO OBJECTION

External Lighting: While there is no specific environmental report prepared for the development, the lighting information submitted is considered sufficient to demonstrate if areas within the scheme will be appropriately illuminated without resulting in any environmental impacts. Overall, the lighting design shows appropriate lighting with levels compliant with relevant British standards.

Daylight, Sunlight and Overshadowing: The assessment concludes that all rooms in the proposed building at Phase 3b will meet relevant daylight criteria with Phase 3a in place. The development will achieve 95% compliance with BRE Daylight Illuminance targets across all proposed rooms, with 100% of 'habitable' rooms (i.e. bedrooms, living rooms, kitchens etc.) achieving compliance. 78% of all proposed units achieve compliance with BRE Sunlight Exposure targets across proposed units. While some rooms experience below the target of 1.5 hours of sunlight exposure. It is accepted that this is largely a result of orientation, and it is not considered that these failures constitute a significant issue with the design of the development, and these areas may benefit from balconies which provide good levels of amenity.

EDC Officer Comment – The lighting as proposed needs to be secure by planning condition. In respect to daylight the floor layout has been amended to provide a window wrapping around the corner of the amended built form to provide fenestration on a second aspect. Whilst no revised Daylight Assessment was supplied this would result in a betterment to the original on which the above comments are based.

4.4 Southern Water

Received 29 July 2025 – ADVICE SUPPLIED

The submitted drainage layout has not been made clear to show the location of the existing sewer crossing the site (Shown in the GIS document attached) with the required 3m easement. They advise that the applicant needs to supply this information to Southern Water before a connection application can be submitted to SW and approved. They also provide generic advice regarding SUDs including that no soakaways should be connected to the public surface water sewer.

EDC Officer Comment: This advice has been shared with the applicant but the information referred to is not a planning matter.

4.5 KCC Public Rights of Way and Access Service

Received 30 September 2025 – NO OBJECTION

Public Footpath NU6 currently crosses through the site but is subject to a confirmed public path diversion order which, although not yet brought into effect, will divert the public footpaths to a new route outside the site. In the meantime, the path is subject to a temporary traffic regulation order whilst construction work takes place.

EDC Officer Comment: This matter has been the subject of the OPP within which the phasing strategy and construction management plan required approval of temporary footpath diversions whilst confirmation of a permanent diversion to outside the site was achieved and is to be implemented. The KCC PROW officer takes this into account in their advice of 'no objection' to this RMA proposal and the planning appraisal similarly follows this approach to the PROW matters.

4.6 Natural England (NE)

Received 14 October 2025 – COMMENTS SUPPLIED

NE direct attention to their standing advice in respect to potential impacts of this proposal on statutory nature conservation sites or protected landscapes in relation to

the impacts of the proposal on statutory nature conservation sites or protected landscapes.

4.7 KCC Minerals and Waste

Received 13 August 2025 and 13 October 2025 – NO OBJECTIONS OR COMMENTS
KCC have no land-won minerals or waste management capacity safeguarding objections or comments.

4.8 Port of London Authority

Received 16 October 2025 – NO FURTHER COMMENTS subject to conditions
Originally objected to the proposal on 5 grounds related to noise matters but following the submission of revised NIA clarifications and information all objections were withdrawn subject to conditions to ensure that future occupiers are made aware of 24 hour safeguarded wharf/industrial operations and the mechanical ventilation mitigation measures as an alternative to opening windows and that opening windows cannot be relied on as a means of preventing overheating (on relevant facades). It must be made clear that for prospective occupiers/owners any potential noise complaint at or below an agreed noise level (which should be agreed in consultation with wharf operators) would not be acceptable, given the various noise generating uses in close proximity to the development.

EDC Officer Comment: This is considered in detail in the noise section of the report. Subject to appropriate mitigation measures the proposed development should not impact on the existing industrial uses in the vicinity of the application site.

4.9 Kent County Council (KCC) Highways

Received 11 November 2025 – NO OBJECTION subject to conditions re the public highway. Comments provided re private roads.

The LHA is concerned with proposals that may affect the adopted highway network. The following comments relate to issues that may affect College Road (public highway), which runs north–south along the western side of the parcel and, while the ‘no objection’ pertains exclusively to elements affecting the adoptable highway, additional observations have been provided regarding areas that will remain in private ownership. With respect to the public highway conditions are required in relation to:

- Vehicular visibility splays
- Pedestrian visibility splays
- Grampian - No occupation of dwellings until the parking survey and control measures secured under application EDC/23/0086 (Phase 3A) have been implemented in full
- Grampian - Restricting occupation of dwellings until the visitor parking spaces in College Road under EDC/25/0104 (Abacus Corner) to be secured through a TRO are operational
- Grampian - No occupation of dwellings until public highway double yellow lines in the public highway in College Road (as per TA plan) fully implemented and operational
- Any units without a parking space must be advertised as ‘car-free’
- Minimum of 41 vehicle parking spaces shall be provided prior to the first occupation
- Minimum of 28 active electric vehicle charging points, each with a minimum output of 7kW
- A bollard shall be installed (and permanently maintained) on the pedestrian link to College Road, adjacent to the driveway for Plot 3
- Minimum of one secure cycle parking space per bedroom shall be provided prior to the occupation of the associated use. A minimum of seven visitor cycle parking stands (providing 14 spaces) shall be provided prior to the occupation of the site

- The adapted cycle parking spaces required for this development, as shown under application EDC/25/0104 (Abacus Corner), shall be provided prior to the first occupation
- A Construction Management Plan pre-commencement
- Prior to first occupation, a Parking Management Plan, as a minimum: a) Details of how all parking spaces will be managed including information related to any Traffic Regulation Orders, private parking management, permit systems and time limits. b) Details of how inappropriate parking outside of designated bays will be prevented (with reference to the Parking Restrictions Plan Double Yellow Lines 332410098_300.100_106 Revision P02 contained within Appendix A of TN001 Rev B, dated 19th June 2025). c) Details of the monitoring methodology. d) Details of arrangements for the management and maintenance of electric vehicle charging points

Further comments:

- It is recommended that one year's free membership to the car club and £50 driving credit, be provided for new residents. The applicant has 'noted' this recommendation; therefore, it is requested that this is included in any permission granted
- The applicant has confirmed that the forward visibility splay at the crossroads, shown on plan 332410098_300.100_104 Revision P04, crosses third-party land (Plot 18). This raises concern. The splay must be conditioned to ensure that the new resident cannot place anything exceeding 1.05m in height within this splay
- The Parking Strategy Plan (EVH3-BPTW-ZZ-00-ST-A-5600 Revision C05) has been updated and now shows that the parking bay on the eastern road, previously located on the 'up-ramp', has now been relocated north. This is welcomed. However, the crossing on the eastern side still does not fully align with the crossing on the western side

Officer comment: The suggested Grampian-style condition in relation to the need for parking survey and control measures (Controlled Parking Zone) secured under application EDC/23/0086 (Phase 3A) to have been implemented in full prior to occupation is not agreed as the small number of car free units in this phase is not considered sufficient to warrant the CPZ. The CPZ implementation (if a consultation in successful) is required in relation to both Phases 3A and the Abacus Corner applications. While the applicant has acknowledged the request for a driving credit per dwelling, this would need to be secured through a legal agreement. As it is not a policy requirement, it would not justify the inclusion of an additional obligation or trigger the need for a further legal agreement.

4.10 Kent County Council (KCC) Ecology

Received 8 October 2025: NO OBJECTIONS

The mix of native and non-native plants within the indicative planting plan will benefit pollinators and if managed correctly will enhance biodiversity. The lighting plan demonstrates that the majority of the light falls within the site boundary other than a fitting lighting the adjacent site as part of the holistic lighting approach for the wider site. KCC recommend adopting the KCC highways dimming regime (regardless of whether it is adopted or not) to further reduce light spill which will benefit both nocturnal animals and residents. In relation to biodiversity enhancements the addendum document confirms the addition of 3 integrated bat boxes, 3 integrated bird boxes and two log piles. Whilst they advise an increase in features they defer to EDC.

EDC Officer Comment: These comments have been shared with the applicant and the applicant but at this time the enhancement remains as proposed. The KCC lighting

regime details will be reminded by planning informative. There is a phased Landscape and Ecology Management Plan condition attached to the OPP.

4.11 Kent Fire and Rescue

Received 31 July 2025 - OBSERVATIONS

It appears that the emergency access requirements have been met. Building regulations consultation will be required.

4.12 Active Travel England

Received 29 September 2025 – NO COMMENT

4.13 GBC Housing Strategy

Received 27 October 2025 - COMMENTS

The proposal is required to comply with the affordable housing percentage and based on the housing needs for different house types suggest the following breakdown in terms of percentages for each.

1-Bed	308	30%
2-Bed	363	35%
3-Bed	251	25%
4Bed+	100	10%
Total	1022	

EDC Officer Comment: The proposal submission as originally supplied advised that the Affordable Housing proposal was for 30% Discount Market Housing due to viability and as such no breakdown of tenures (referred to by the GBC officer) was supplied. Following revision the Affordable Housing proposal is now to provide 3no. 1-bed Shared Ownership flats, 4no. 2-bed Shared Ownership flats, and 2no. 2-bed Affordable Rent flats.

4.14 GBC Waste Services

Received 27 October 2025 – REFUSE STRATEGY ACCEPTABLE

4.15 GBC Environmental Protection Officer (noise)

Received 27 October 2025 – COMMENTS PROVIDED

Subject to the mitigation measures/specifications provided in the report are secured there is no objection in relation to internal noise levels.

Noise levels on a number of external balconies may exceed the upper value of 55dBA for external amenity areas. The EDC consultant has advised that bearing in mind the limited size of these balconies they are more likely to be use for storage, pot plants, drying washing as opposed to relaxation for extended periods, and based on this, the exceedances are not sufficient to refuse the scheme on noise grounds. This is agreed with providing other shared external amenity areas in the vicinity comply with the WHO/BS8233 criteria for such areas.

4.16 Environment Agency

Received 30 September 2023 - NO OBJECTION subject to conditions

Required planning conditions related to: finished floor level of minimum 8.0AOD; advise registering for the EA's flood warning service; recommend flood resistance and resilient measures are utilised in the build. No objections to the drainage strategy which directs surface water drainage to the River Thames via Robin Creek. Foul water drainage will be connected to the Southern Water sewer.

4.17 Kent Police Designing Out Crime Officer (DOCO)

Received 25 July 2025 – COMMENTS SUPPLIED

Recommend the provision of informal association areas, that are subject to natural surveillance and well-lit, for members of the community, particularly young people; perimeter/boundary treatment must be a minimum of 1.8m; SBD guidance highlighted in respect to pavements and shared vehicle/pedestrian routes; security should be provided for motorbike/electric bikes; the use of parking courts should be avoided where possible due to increased opportunities for crime, when unavoidable the parking courts should be subject to natural surveillance; signage should mark visitor parking spaces for clarity; planting/trees should not reduce opportunities for surveillance; lighting plans should be reviewed by an ILP lighting professional; advise re door/window/cycle store security; the use of trade buttons to prevent access for non-residents; defensive treatment for ground floor windows; best practise for the design of communal entrances, including the use of CCTV.

4.18 Kent County Council (KCC) Heritage

Received 3 October 2025 - COMMENTS SUPPLIED

The county archaeologist confirms that the archaeological fieldwork for this Phase is complete. The post-excavation analysis and reporting is being undertaken for this area and, as well as the wider Harbour Village site is currently being worked on by RPS and Archaeology South-East for Bellway Homes.

In relation to the public realm and heritage information, the DAS includes information about the industrial cement heritage of the site to inform the design approach. It will be important to ensure all parts of the wider site are consistently included in the provision of heritage information (i.e. signage) that will allow residents and visitors to find and enjoy the public spaces where there will be information about the archaeology and history of the site.

EDC Officer Comment: This advice has been shared with the applicant and a comprehensive meeting regarding archaeology and heritage for the whole of Harbour Village has recently taken place. It is agreed by all parties that the heritage interpretation scheme needs to be considered, formulated and implemented on a coherent, site wide basis.

4.19 Kent County Council (KCC) Lead Local Flood Authority (LLFA)

Received 17 October 2025 – NO OBJECTION

4.20 The following organisations and local ward councillors were consulted on the application but provided no comments:

- Kent Wildlife Trust
- RSPB
- UK Power Networks
- KCC Minerals and Waste
- Northfleet Harbour Trust
- National Grid
- Cllr Jo Hart
- Cllr Peter Scollard
- Cllr Alison Williams

5.0 **PLANNING POLICY**

5.1 National Policy

- National Planning Policy Framework (NPPF)

- 5.2 The Government launched a consultation on a revised draft of the National Planning Policy Framework (NPPF) on 16th December 2025 that closed on 10th March 2026. The draft introduced a fundamentally new structure, replacing numbered paragraphs with local plan-style policies. Key changes included the reintroduction of strategic planning through Spatial Development Strategies, an expanded presumption in favour of sustainable development, and measures to support SME developers. It also reflects recent legislative changes and adds a new chapter on clean energy and water to align with the Government's Clean Power by 2030 ambitions. While the draft (consultation version) NPPF represents a significant overhaul rather than a simple refresh and is indicative of the future direction of national planning policy. Until a formally updated version is published in due course, it carries limited weight in the determination of this application. For the avoidance of doubt, the current NPPF (dated December 2024 as updated in February 2025) remains a material consideration in the determination of this application.

Development Plan

- 5.3 The development plan comprises the adopted Gravesham Local Plan Core Strategy September 2014, saved policies from the adopted Gravesham Local Plan First Review 1994 and the Kent Minerals and Waste Local Plan 2020. Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework.
- 5.4 The policies relevant to the consideration of this application are set out below.

Gravesham Local Plan Core Strategy (September 2014):

- Policy CS01 - Sustainable Development
- Policy CS02 - Scale and Distribution of Development
- Policy CS03 - Northfleet Embankment & Swanscombe Peninsula East Oppo. Area
- Policy CS07 - Economy, Employment and Skills
- Policy CS10 - Physical and Social Infrastructure
- Policy CS11 - Transport
- Policy CS12 - Green Infrastructure
- Policy CS13 - Green Space, Sport and Recreation
- Policy CS14 - Housing Type and Size
- Policy CS15 - Housing Density
- Policy CS16 - Affordable Housing
- Policy CS18 - Climate Change
- Policy CS19 - Development and Design Principles
- Policy CS20 - Heritage and the Built Environment

Gravesham Borough Local Plan First Review 1994 - Saved Policies

- Policy T1 - Impact of Development on Highway Network
- Policy T5 - New Accesses onto Highway Network
- Policy P3 - Policy for Vehicle Parking Standards
- Policy LT6 - Additional Open Space in New Housing Development

- 5.5 Emerging Policy - Gravesham Proposed Submission Draft (Regulation 19) Local Plan Gravesham Borough Council (GBC) opened a consultation on its Proposed Submission Draft (Regulation 19) Local Plan on 17th April 2026 which runs for 6 weeks and closes on 29th May 2026. This consultation includes the version of the Local Plan that GBC intend to submit for independent examination by a government appointed

independent Planning Inspector in Autumn 2026. When adopted, the new Local Plan will replace the current Gravesham Local Plan Core Strategy (2014).

5.6 It is necessary to consider the weight to be afforded to the emerging Local Plan when assessing the application subject of this report. Paragraph 48 of the NPPF (2024) records the planning law requirement that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the development plan. The NPPF, at Paragraph 49, allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the NPPF (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).

5.7 As the emerging Local Plan is in the process of being consulted upon (it has reached but has not yet completed consultation at the Regulation 19 stage), GBC is not yet aware of whether third parties will support or object to specific policies within the Plan or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, it is considered that limited weight should be afforded to the policies contained within the emerging Regulation 19 Local Plan. The specific degree of weight to be afforded would change once the emerging Local Plan has progressed to submission and examination, with the decision maker being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the NPPF challenged.

Kent Minerals and Waste Local Plan (MWLP) 2024-2039 (Adopted March 2025):

- Policy CSW 2: Waste Hierarchy
- Policy CSW 3: Waste Reduction
- Policy DM 8: Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Southeast Inshore Marine Plan 2021

Policy SE-ACC-1 - Access

Policy SE-TR-1 - Tourism and Recreation

5.8 The following national and other planning guidance is also relevant and material to the determination of this application:

National Guidance:

- Planning Practice Guidance (PPG)
- National Design Guide
- Technical Housing Standards – Nationally Described Space Standards (2015)

GBC Supplementary Planning Guidance

- SPG 2: Residential Layout Guidelines (Adopted Feb 1996 - Amended June 2020)
- SPG 4: Kent Vehicle Parking Standards (July 2006)
- Design for Gravesham 2024

KCC Supplementary Planning Guidance:

- KCC Safeguarding SPD (2021)
- The Kent Design Guide (2000)
- Kent County Council Developer Contributions Guide (2023)

EDC Guidance:

- Ebbsfleet Implementation Framework
- Design for Ebbsfleet Character Guide
- Ebbsfleet Public Realm Strategy
- Ebbsfleet Sustainable Travel Strategy
- Ebbsfleet's Parks & Open Space Design Criteria
- Community Building Design Principles

Other Guidance:

- Building for a Healthy Life 2020
- Professional Practice Guidance on Planning & Noise New Residential Development May 2017 (ProPG)
- Building With Nature
- The Thames Estuary 2100 Plan

6.0 PLANNING APPRAISAL

6.1 The main issues to be considered in connection with this proposal are:

- The principle of development
- Reserved Matters (access, appearance, landscaping, layout and scale)
- Highways matters
- Affordable housing delivery
- Housing standards including amenity
- Heritage and Archaeology
- Sustainability
- Flood Risk and Drainage
- Biodiversity and Ecology
- Building for a Healthy Life

Principle of Development

6.2 The application site lies within the urban area of Northfleet, and as part of the Harbour Village development, and within sub area 1.4 of the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area. This is a key site identified in the Gravesham Local Plan Core Strategy (LPCS Policy CS03) for residential extension between the existing established community of Northfleet and the River Thames. LPCS Policy CS02 prioritises residential-led development taking place in the urban area, and the location is sustainable being close to existing bus stops, local shops and a primary school.

6.3 The proposal comprises the second part of the third residential phase (Phase 3B) of the Northfleet Embankment West mixed-use development, with the principle of the residential use of the application site established through the outline planning permission and approved residential masterplan, approved in part under reference EDC/20/0080. The new east-west Fastrack corridor will run to the north of the site, further supporting the location as being sustainable for residential development.

- 6.4 The proposed 39 dwellings, together with previously approved reserved matters, would remain within and fully comply with the overall upper limit of 567no. residential units approved under the outline permission (as amended in May 2023).
- 6.5 In summary, the proposal is considered to be acceptable in principle, however, as well as demonstrating compliance with adopted Gravesham LPCS policies it is also necessary for reserved matters submissions to comply with the comprehensive set of design parameters and high-quality design framework set by the site-specific detailed residential masterplan. In addition to incorporating commitments of approved outline site-wide strategies, the masterplan embedded principles contained within EDC design guidance including Design for Ebbsfleet, Ebbsfleet Sustainable Travel Strategy and Ebbsfleet Public Realm Strategy and aligned with the Ebbsfleet Implementation Framework. These matters form part of the consideration of the details of the proposal, as examined below.

Reserved Matters - Layout, Scale and Appearance

- 6.6 Gravesham LPCS Policy CS19 requires that the design, layout, and form of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene, the quality of the public realm and the character of the area. Delivery Theme 1 of the Ebbsfleet Implementation Framework seeks to ensure that the designs of new neighbourhoods follow good urban design principles to deliver attractive, safe, and efficient layouts that contribute positively toward an appropriate character for Ebbsfleet.
- 6.7 Gravesham LPCS Policy CS15 requires all new housing to be developed at a density consistent with achieving good design that does not compromise the distinctive character of the area it is situated. As a development within the urban area a minimum density of 40 dwellings per hectare (dph) is expected to be achieved. The Phase 3B parcel has an area of about 0.6hectares (ha) and the proposed density in this phase equates to approximately 65dph, in accordance with this policy.
- 6.8 NPPF paragraphs 131 and 135 require developments to be visually attractive as a result of good architecture, layout, and appropriate and effective landscaping, sympathetic to local character and history. New development should establish or maintain a strong sense of place, and create attractive, welcoming, and distinctive places to live, work and visit.
- 6.9 The approved masterplan established a strong movement structure based on a gridded street network that connects the existing settlement of Northfleet, to the south of the site, with the River Thames to the north. The site layout and street typologies are identified within the masterplan and the Phase 3B proposals substantially accord with them and the scheme uses perimeter blocks to create enclosure to all streets and public spaces across the site and to support a highly legible street network, framing the key Fastrack route along the harbour.
- 6.10 The detailed residential masterplan identifies seven character areas for the residential land. Phase 3B crosses three of the character areas – the ‘Fastrack Road’, ‘Residential Streets’ and ‘College Road’ character areas.
- 6.11 For the apartment block fronting onto the Fastrack route there has been adopted a design narrative informed by analysis of historic building types and specific buildings found within Gravesham town centre, of Georgian and Victorian residential building typologies. The design continues the approach of Blocks A-C within Phase 3A to the east, and references a contemporary Georgian design narrative. At four storeys the

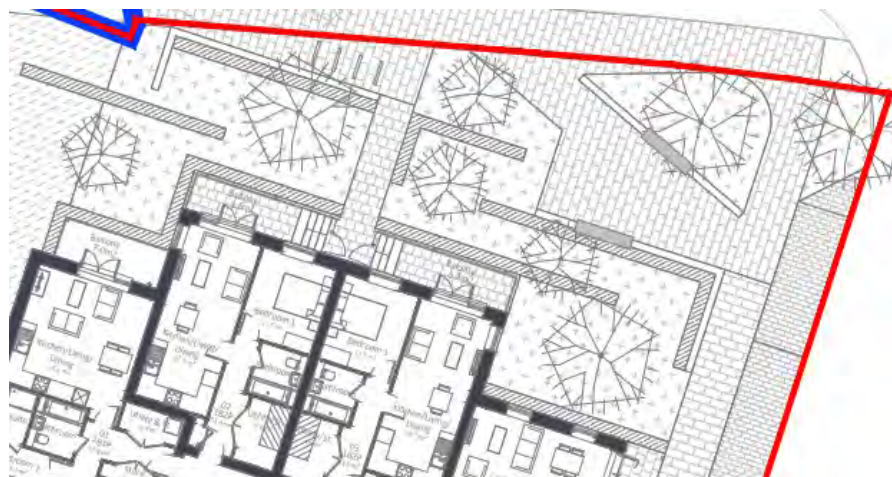
building meets the approved increased number of storeys following a non-material amendment to the building heights parameter plan. The building is expressed with a white plinth and contrasting yellow brick to upper levels. Arched windows and feature brickwork window surrounds, as well as feature stone banding, establishes a clear character to these blocks.

- 6.12 For the houses fronting on to College Road they are of a scale and appearance which was developed in detail for Harbour Village Phase 2. The materiality, scale and detailing of the houses along College Road reflect the existing materiality of the 100m flint retaining wall in this location.
- 6.13 For the houses within the 'Residential Streets' that are proposed internal to the phase they demonstrate variation with the use of yellow brick, red brick with red roof tiles and slate effect roof tiles. At internal road junctions a black weatherboard is introduced to detached dwellings at first floor level with buff brick below. There is seen to be some articulation with bay windows and projecting entrances on the detached dwellings at the internal junctions and the last revision of details features more windows within the exposed flank walls of terrace dwellings.
- 6.14 The building heights proposed in this phase accord with the parameters set out in the outline planning permission and residential masterplan. In terms of scale and design, the dwellings would provide an appropriate and harmonious transition between adjoining phases of development.
- 6.15 Overall, subject to appropriately worded planning conditions securing architectural detailing and materials, the layout, scale and appearance of the proposed development is considered acceptable.

Reserved Matter – Landscaping

- 6.16 Gravesham LPCS Policy CS19 requires new development to include details of appropriate hard and soft landscaping to ensure that the public realm and open spaces are well planned, appropriately detailed and maintained so that they endure. This is supported by Policy CS12 which seeks a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors. Delivery Theme 4 of the Ebbsfleet Implementation Framework emphasises bringing in the 'green' landscaping to promote healthy landscapes and encourage active lifestyles.
- 6.17 The applicant seeks to discharge conditions 9 and 15 of the outline planning permission in relation to this phase. Condition 9 in part requires '*a schedule of the public open spaces...including details of location, layout and typology.*' Condition 15 requires, in part, a range of information to be provided including design and maintenance of the public realm and other areas with a public amenity function. Other aspects of these conditions are discussed also within this report.
- 6.18 The masterplan has established a framework of public open spaces linked together by green healthy streets and habitat corridors. The framework helps to re-connect Northfleet with its Riverside, opening views and walks from existing residential areas down towards the River Thames. Within this sub-phase would be the delivery, in part, of one of the landscaped pedestrian connections to College Road and to the front of the apartment block would be delivered a section of the wider public realm, which will combine with public realm to be delivered within the Abacus Corner proposal, forming a 'communal garden'. This area would comprise shrub planting, formal hedges and tree planting. Concrete walls would double as seating, which the applicant's Design and Access Statement says '*creating a rhythmic succession that nods to the site's*

industrial heritage, and raised planters *'reference the former airshafts and subtly guide pedestrian flow'*. Cycle stands have also been combined into this area to serve as visitor infrastructure.



(Source: Revised Ground Floor Layout Plan)

- 6.19 Overall, the scheme generally employs good levels of tree planting and low-level planting aligned with the approved street hierarchy and the public realm strategy. However, during the revision of the street parking to the south of house plots 9 & 10 a street tree has been removed and a line of 5no. parallel parking bays are now proposed on this road residential street without break-up. This matter is balanced as it is the result of the achievement of the proposed on-site parking numbers. This amount of hard surfacing and the uninterrupted parking layout does not meet the aspirations of the Ebbsfleet design guides, which would seek a softer street character with increased planting over that proposed, and as such has scored an amber in the relevant section of BFHL assessment.
- 6.20 The roof of the apartment block includes further green infrastructure in the form of biodiverse/brown roof. Final details of the brown roof is to be approved by use of planning condition.
- 6.21 Overall, subject to appropriately worded planning conditions, the landscaping of the proposed development is considered acceptable.

Reserved Matter – Access together with Highway Impact and Parking

- 6.22 Gravesham Core Strategy Policy CS11 seeks new developments to mitigate their impact on the highway and public transport networks. Local Plan saved policy T1 supports this through requiring the impact on the transport system be considered and that all proposed developments are adequately served by the highway network. Policy T5 requires the formation of new accesses, or the intensification of existing accesses to only be permitted where no danger would arise and where a properly formed access can be created in a location and standard acceptable to the Local Planning and Highway Authorities.
- 6.23 Paragraph 116 of NPPF provides that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 117 advocates that appropriate opportunities to promote sustainable transport modes should be taken up, and that safe and suitable access to the site can be achieved for all users, and that significant impacts from the development on the

transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

Background – highway management

- 6.24 As a point of note, matters of road adoption and parking management within the Harbour Village development has evolved since the grant of outline planning permission, the agreement of the masterplan and early RM phases.
- 6.25 At the time of determination of Phase 1B Reserved Matters the proposal was based on the roads within the site being adopted as public highway and the use of permit parking spaces within the streets, to be managed by Gravesham Borough Council. At the time that Phase 2 was presented to planning committee the applicant advised all roads within the Harbour Village development were to be retained in private ownership, other than the Fastrack road, and a management company would be set up to manage parking and ongoing street maintenance (including verges and lighting) through a service charge to residents. This change of approach was in part due Building Regulations updating to require that every house in the development must have at least one Electric Vehicle (EV) charging point, but the Local Highway Authority did not until very recently permit Electric Vehicle charging units to be located within an adopted highway verge. Therefore, the decision was made at that time to retain the roads within private ownership to facilitate the provision of on-street EV charging facilities.
- 6.26 Furthermore, it is also intended that a single site wide parking management strategy (to be agreed) will be employed for the whole of Harbour Village, including Abacus Corner as an extension to Harbour Village, as an outcome of the decision to retain the roads within the site in private ownership and the allocation of all car parking spaces within the site, other than visitor, community centre and car club spaces.

Reserved Matter – Access

- 6.27 The primary motorised vehicle access route through the site is a continuation of the north-south Hive Lane road extension, which runs through Phases 1B and 2. Branching off this primary access road is a grid of secondary vehicle roads to the west of the extended Hive Lane. The sub-phase 3B development would be accessed from the approved grid and continue its expansion. The road layout is generally in accordance with the residential masterplan, to ensure a cohesive and legible scheme.
- 6.28 Pedestrian and cycle access through the sub-phase form part of the strategic walking network set out in the Implementation Framework. North-south running footways and cycle paths provide connections for residents of earlier phases, and existing Northfleet residents, through to Robins Creek, the riverside promenade park, the community centre in phase 3A and the Fastrack road and bus stops. Running east to west within the site is a lower tier laneway-type street, designed as a low traffic shared surface road and then from this street is a landscaped, pedestrian through-route to College Road. Overall, the design of the pedestrian and cycle routes around and through the site allow for good levels of permeation.
- 6.29 It has been raised by the KCC Highway officer that the package of parking restrictions and on-street parking provision proposed for College Road within the concurrent Abacus Corner application (EDC/25/0104) are in such a configuration as to provide unimpeded access to the on-plot parking for one of the dwellings within Phase 3B, facing onto College Road, as well as for access for emergency vehicles and refuse vehicles for the Harbour Village development. The proposed parking spaces are

precisely located to allow for filtration by all vehicles and would also act as traffic calming on College Road.

- 6.30 Overall, both the Phase 3B RM development and Abacus Corner full application development rely on the proposed College Road highway works, including parking spaces, being delivered. In a scenario where the Abacus Corner development does not precede this development, in indeed is never built, then KCC Highways advise they would retain an objection to the proposal unless these items are delivered prior to occupation of dwellings within Phase 3B. In procedural terms these highway works would need to be secured via a Traffic Regulation Order (TRO) amendment and section 278 works. A TRO amendment has to go through a public consultation exercise prior to agreement and as such is not guaranteed. In this case if the TRO is not secured then the Phase 3B proposal would not be acceptable as neither the extant highway layout in College Road, nor the Phase 2 highway works that in part remain incomplete, would be acceptable in relation to the Phase 3B parking proposal, nor would there be acceptable visitor parking levels be available to serve the development.
- 6.31 Therefore, any approval for this RM proposal would need to be subject to Grampian-style conditions to provide a scheme of highway improvements and 6no. parking spaces within College Road. These Grampian-style conditions would not need to be agreed, to ensure the development layout would be robust, but the delivery would be prior to occupation. Informatives are used to advise these highway changes should be based on the College Road highway works shown on drawing *332410098-800.100 Revision P04 (appended to Stantec document 'KCC Response Technical Note 2')*.
- 6.32 Following agreement of the TRO amendment, KCC Highways has requested a condition that no occupation of Phase 3B should take place until the double yellow lines within College Road, under the Abacus Corner application highway drawings, have been completed. Within Transport Note TTN2 the applicant responds to this request as *'Noted and accepted.'*
- 6.33 KCC Highways have also requested a number of other conditions in relation to the matter of Access, related to both the private streets within the site as well as the public highway. Conditions are requested for: the provision and retention of pedestrian and vehicular visibility splays; provision and retention of approved residents'/visitors parking spaces; a bollard to be installed adjacent to the driveway of plot 3 to prevent vehicles parking on/overhanging the pedestrian route; and, securing forward visibility at the cross-roads internal to the site, which crossed third party land (Plot 18).
- 6.34 Overall, subject to appropriately wording of these various planning conditions, the matter of Access for this proposed development is considered acceptable and would ensure that safe and secure access for all users of the site could be achieved and would not interfere with the safe and free-flow of the local highway network.

Parking and Highway Impact

- 6.35 The highway impact of this strategic mixed-use development as a whole, for which Phase 3B forms a part, has been accepted under the OPP, including the provision of a series of financial commitments secured through the s.106 Agreement, including a study to assess the operation of the Northfleet High Street / Hive Lane Junction and highway improvement scheme (if necessary based on criteria set out in the s.106 Agreement); a financial contribution towards the cost of a Traffic Regulation Order (TRO) at Northfleet High Street / Hive Lane; a financial contribution towards the provision of Fastrack bus services; and delivery of the Fastrack route and bus stops.

- 6.36 The application site lies within a 'highly accessible' area, as identified by EDC's Sustainable Transport Strategy (STS), due to its location near to existing bus routes along Northfleet High Street and Northfleet Railway Station, as well as to local shops and a primary school.



(Source: EDC/21/0086 - Phasing and Implementation Plan for OPP)

The future east-west Fastrack route would run to the front of the apartment block proposed within this sub-phase. Within the agreed Phasing and Implementation Plan (PIP) the provision of the 'Bus Road West' section of the Fastrack route (shown in orange on the plan above), is required prior to the occupation of the 100th dwelling within Harbour Village Phase 3A. A Reserved Matters application for the 'Bus Road East' section running adjacent to Phase 3B and through the Abacus Corner site, was submitted prior to the expiry of the outline permission and remains undetermined; its delivery is required by the PIP prior to occupation of the 500th dwelling across the Harbour Village site as a whole.

- 6.37 The OPP required the agreement of a Residential Travel Plan (RTP) as well as providing a range of sustainable transport initiatives. The RTP (condition 33 of EDC/16/0004) for Harbour Village was approved under reference EDC/22/0096 and included:

- the provision of one 7kW electric vehicle charging point per house and 10% active and 90% passive (including ducting installed) for each parking court;
- unallocated on-street parking subject to a parking permit and managed by Gravesham Borough Council;
- secure cycle storage for all units at a rate of 1 per bedroom;
- visitor cycle stands at Chimney View Park;
- appointment of a Travel Plan Co-ordinator;
- provision of a car club on site with a minimum of 3 spaces provided;
- one year's free membership per household to the on-site car club (on demand).

- 6.38 Notwithstanding the 'highly accessible' location of the site at the time of the consideration of the masterplan, in respect to the potential for the development to result in parking overspill to the surrounding streets, a bespoke residential parking ratio was agreed within the residential masterplan that pre-dated the EDC Sustainable Travel Strategy (STS) and exceeds STS guidance parking ratio. The agreed OPP parking ratio is:

- 1 bedroom apartment – 1 space
- 2 bedroom house/apartment – 1 space
- 3 bedroom house – 1.5 spaces

- 4 bedroom house – 2 spaces
- visitor parking in addition to residential parking numbers
- one active electric vehicle (EV) charging point per house with a garage or driveway
- 10% active and 90% passive provision for shared parking courts cycle stores.

6.39 For areas identified as ‘highly accessible’, the STS advises residential parking provision of between 0–0.8 spaces per 1–2 bed apartment and 0–1.2 spaces per 3-bed dwelling. These ranges include visitor parking. In this regard, the STS further advises that a minimum of 20% of all parking spaces should be unallocated and located within the public realm, in order to provide appropriate levels of visitor parking.

Table: Parking and Cycle Provision Numbers

Type	Masterplan Parking Ratio	STS – Highly Accessible Area	No. Spaces Proposed
Residential: 1 & 2-bed flats = 21 3-bed houses = 18	(1 space) = 21 (1.5 space) = 27 Total = 48 (plus visitor parking)	(0 - 0.8) = 0 to 16.8 (0 – 1.2) = 0 to 21.6 Total = 0 to 38 (inc. visitor parking)	Total = 33 (plus 7 tandem spaces)
Visitor	undefined	20% of total = 0 to 8	= 1 on private street
Car Club	= 0	= 0	= 0
Cycle provision		1 space per bedroom = 88	= 88 plus visitors

6.40 Notwithstanding the masterplan parking ratio, a different approach to residents’ parking levels was agreed for Phase 3A, which included:

- 86no. ‘car free’ residential units out of 273no. units
- additional measures to the OPP Travel Plan
- site wide parking management to address the evolved parking strategy
- S106 obligation (UU) to fund design, consultation and implementation of a Controlled Parking Zone (CPZ) within public highway within ¾ mile radius of the site

6.41 A total of 41 parking spaces (included tandem on-plot provision) are proposed to serve 21 apartments and 18 houses, resulting in 6no. car-free units within the Phase 3B development.

6.42 As with the Phase 3A application, both the KCC Highways Officer and the LPA raise concerns regarding the adequacy of the proposed parking provision and the absence of robust parking management measures. It is considered that this could lead to unsafe and sporadic parking behaviour both within the surrounding publicly maintained highway network and on the retained private streets within the site, including parking on roundabouts and obstruction of visibility splays.

6.43 It is also relevant when considering parking matters to note that Fastrack buses would only start running through the Harbour Village in the very late stage/complete occupation of the development. The absence of an operational Fastrack service at the point when residents first move in may increase reliance on private vehicles, particularly among occupants of car-free units, households with more than one vehicle, or residents requiring a work van. This, in turn, increases the risk of parking overspill onto surrounding unrestricted streets during the early occupation phases.

- 6.44 Due to the significant number of car-free dwellings, the Harbour Village Phase 3A Reserved Matters permission (ref. EDC/23/0086) was granted subject to a legal agreement securing measures to introduce a Controlled Parking Zone (CPZ) / Permit Parking Area (PPA) in the surrounding area. The trigger for the first payment to design and consult in respect to a CPZ was *'prior to first occupation of Phase 3A'*. The second payment for installation of the CPZ, if approved, was to be paid following the approval.
- 6.45 This current Phase 3B reserved matters application is being considered concurrently with the full planning application for Abacus Corner (EDC/25/0104) which includes a further 40no. car-free units. The significant cumulative number of car-free units in that development means that application is recommended for approval subject to the same planning obligation for a CPZ as under Phase 3A reserved matters approval. Whichever of those two developments comes forward first will fulfil the obligation, to avoid duplication.
- 6.46 It is not considered necessary for a reserved matters approval for Phase 3B to be subject to a CPZ obligation, as the proposal includes only 6no. car-free units. On its own, this limited level of car-free provision is unlikely to generate a degree of overspill parking that would justify a CPZ requirement, notwithstanding the KCC Highways request for a Grampian-type condition requiring any agreed CPZ to be implemented prior to occupation. In practice, Phase 3B is unlikely to come forward in advance of Phase 3A, for which conditions are actively being discharged. Furthermore, due to the functional relationship between Phase 3B and the Abacus Corner development, the proposed apartment block containing the car-free units would be delivered broadly in tandem with Abacus Corner should the Phase 3A delivery stall. The Abacus Corner proposal would, in any event, secure the CPZ.
- 6.47 As with the Phase 3A permission, the KCC Highways officers require that future residents of Phase 3B be made aware at the time of purchase of the private nature of the streets and arrangements for the management and maintenance of the streets. In addition, it is considered to be critical that purchasers (particularly of the 1 bedroomed apartments) are made aware that they do not have a right to park on the site without securing a permit and the developer is funding the installation of a Controlled Parking Zone in surrounding streets to prevent residents from Harbour Village parking within the local streets. A planning condition was used within the Phase 3A permission to require details to confirm how future purchasers will be made aware of parking management regimes and allocation of spaces as part of purchase of this development, including how this will be communicated through the marketing process. It is required that this same planning condition should be used in a reserved matters approval for Phase 3B.

College Road Highway Works

- 6.48 The concurrent Abacus Corner proposal includes provision of 3no. additional visitor parking spaces within College Road, which would also function as traffic-calming and speed-management measures. KCC Highways consider these spaces to be necessary to serve both the Phase 3B and the Abacus Corner developments. In their absence, visitor parking provision would be unacceptably limited for the two developments. Accordingly, notwithstanding that the spaces form part of the Abacus Corner scheme, their delivery must be secured by Grampian condition in relation to the Phase 3B development. If the College Road highway works are not delivered, on-street parking could obstruct access to on-site parking for Phase 3B dwellings and potentially prevent emergency and refuse vehicles from safely using College Road. Conversely, without parked vehicles and the associated highway works, vehicle speeds along this section of College Road could be excessive and create unsafe

conditions. Without the mitigation provided by the TRO parking measures, the impact on local highway safety and the efficient operation of the immediate highway network would not be satisfactorily mitigated. Planning conditions are therefore recommended to require this off site provision prior to first occupation of this phase.

Parking Management

- 6.49 In relation to parking management, the parking principles across the whole Harbour Village site has evolved through the progress of the development and between applications, and as such the Phase 3B application and the Abacus Corner application have been accompanied by a further, revised version of a 'Framework Site Wide Car Parking Management Strategy' (FSWPMP). (In earlier phases parking management agreement has been secured by condition and to date no conditions for parking management plans have been discharged).
- 6.50 The proposed management strategy broadly follows the Phase 3A FSWPMP but introduces changes, including an extension of visitor parking to up to 6 hours without a permit, compared to 4 hour, maximum allowed under Phase 3A. Given the limited visitor parking provision across Harbour Village this increase is considered inappropriate.
- 6.51 The extended visitor parking period is considered to be excessive and may be subject to abuse. For example, in the 6 hour scenario if private enforcement of the parking spaces were to stop at say 6pm (no period for enforcement has been detailed in the FSWPMP) and restart at 6am a car could park in a visitor space from midday and not be liable to enforcement action until midday the next day. Abuse of the visitor parking facilities would compound parking issues within the site and inadequate visitor parking availability would encourage unsafe and sporadic parking behaviour within the site and the surrounding publicly maintained streets, such as blocking vision splays or causing physical obstruction. As such neither the detailed 'up to 6 hours' parking within the visitor parking spaces, nor a daily finish time for private enforcement of 6pm, would be acceptable as each on their own and in combination would not adequately manage visitor parking within the site. To minimise abuse and maximise effectiveness of the low number of visitor parking spaces being provided the submitted FSWPMP is not accepted as drafted and a planning condition should be used to secure a revised version be agreed and to apply to the whole of Harbour Village.

Car club

- 6.52 No additional car club spaces will be located within the Phase 3B site, however residents will have access to approved car club spaces/cars within the wider Harbour Village. However, of the 2no. car club spaces secured as part of Phase 1B, the relevant condition does not require the cars to be installed or operational by a specified date, meaning their delivery is subject to market demand. The nearest operational car club provision for Phase 3B residents would therefore be within Phase 3A, where a condition requires a car to be in place and operational prior to first occupation. The Phase 3A proposal also allowed for a 4th space being provided should the desire/need develop. This was considered to be pertinent as that phase was introducing 86no. car-free units into Harbour Village. (Currently the applicant is discharging pre-commencement conditions for the Phase 3A development south of the Fastrack road). The applicant advised at that time that discussion is ongoing with 'Enterprise' but that the decision by the car club operator when to locate a car on the site is dependent on aspects such as the quantum of residents and demand to make the car club viable.

- 6.53 The timely provision of car club cars means the agreed OPP Residential Travel Plan action of the provision of one year's free membership per household to the on-site car club (on demand) is meaningful.

Electric Vehicle (EV) Charging

- 6.54 With respect to EV charging, the proposal would meet the requirements of the masterplan, Residential Travel Plan and current Building Regulations. Some of the EV chargers would be within the private highway street verges and surface level car parks. As such details are required of their exact location and the design of the supporting apparatus, together with details of the ongoing maintenance responsibilities for the charging points should they need replacement or repair, in the interests of good design and sustainable travel. This can be the subject of a planning condition.

Cycle Parking

- ~~6.55~~ Cycle storage spaces are to be provided in accordance with the masterplan and EDC STS, comprising 1 adult bicycle per bedroom for both houses and apartments. Secure and covered cycle parking should be provided in the rear gardens of houses. Details of the stores are to be required by condition to ensure they are fit for purpose and provided prior to first occupation. Secure and integrated cycle storerooms provide an appropriate number of accessible cycle store spaces. However, the adapted cycle parking spaces for this development will be provided in the Abacus Corner development, which may be constructed later than the Phase 3B development. A later provision is not ideal but given that the Abacus Corner development will operate as part of Harbour Village and both car parking allocation and adapted cycle storage will occur cross boundary it is sufficient to ensure delivery under one or other development.

Summary

- 6.56 Notwithstanding that the proposal does not fully accord with the parking ratio/parking principles within the masterplan, the EDC STS underscores sustainability principles which do not want to see an overprovision of parking and in a highly sustainable location it is especially desirable for residents to opt to use alternative forms of transport and not rely on individually owned cars for travel. The reserved matter of Access, as well as the consideration of parking levels, parking management, highway layout, integration with and impact on the public highway are considered to be acceptable subject to the use of planning conditions as discussed above.

Affordable Housing Delivery

- 6.57 Gravesham LPCS Policy CS16 requires the provision of 30% affordable housing on all new housing developments of 15 dwellings or more or on sites of 0.5 hectares or more in the urban area. This was assessed at outline application stage and the S106 agreement consequently was agreed with 4 options for the delivery of Affordable housing on the whole application site. The 4 options are effectively a sliding scale of the amount of on-site affordable housing provision versus a monetary contribution for off-site delivery.
- 6.58 The applicant's approach confirmed through the masterplan and reserved matter phases to date is to provide the full provision on-site, dispersed throughout the site and tenure-blind, which is an approach welcomed by EDC and the Borough Council. This option requires 30% of homes within the OPP development to be affordable, with a

tenure split of 60% intermediate and 40% affordable rented housing. The S106 also requires that no more than 70% of the market units within a phase will be occupied unless and until all the Affordable Housing (AH) Dwellings in that Development Phase have been completed and transferred to the Registered Provider.

6.59 The Affordable Housing Scheme submitted with this application confirms provision of 9no. affordable dwellings equating to approximately 23% of Phase 3B. These will be provided in the mixed use apartment block as detailed in the Proposed Tenure Strategy below.



(Source: Proposed Tenure Strategy)

Affordable Rent Tenure

Type	Size	No	Total
1 Bed	1B2P	0	0
2 Bed	2B4P	2	2
			2

Shared Ownership Tenure

Type	Size	No	Total
1 Bed	1B2P	3	3
2 Bed	2B4P	4	4
			7

(Source: Design and Access Statement addendum document)

6.60 The GBC Housing officer confirms that the housing register’s biggest demand is for 2 bedroom dwellings in an affordable rented tenure, and as such the 2no. 2-bedroom dwellings to be provided in this tenure are welcomed. The AH dwellings are all to be located within the apartment block in this phase. The Shared Ownership units in the northern part of the block and the Affordable Rented units in the southern arm of the block.

6.61 As a cumulative, the 23% AH offering for this final phase of the OPP permission would mean that the residential part of the OPP complies with S106 requirement for 30% of homes within the OPP development to be affordable, and the required tenure split of 60% intermediate and 40% affordable rented housing is also met. As such the proposal would comply also with Policy CS16 of the Gravesham LPCS.

Housing Standards and Residential Amenity

- 6.62 Gravesham LPCS Policy CS19 requires new development to be designed in an inclusive way to be accessible to all members of the community, and to have an appropriate level and quality of private and public amenity space, requiring new development to safeguard the amenity of existing and future occupants, including in respect of privacy, daylight, sunlight and noise. Paragraph 135 of the NPPF similarly seeks a high standard of amenity for existing and future users.
- 6.63 Condition 9 of the outline planning permission requires finished floor levels and finished site levels to be in generally in accordance with the indicative ground levels submitted with the outline submission, to safeguard the amenities of residents within this flood risk area. Condition 9 also requires Reserved Matters applications to mitigate the effects of surrounding industrial and traffic sources of noise, informed by noise surveys to provide a suitably quiet living condition for future occupiers of the development.

Housing Standards & Mix

- 6.64 The proposed dwellings all comply with the Nationally Described Space Standard (NDSS). This would ensure acceptable and adaptable internal spaces, including prescribed levels of storage and minimum ceiling heights.
- 6.65 In terms of outside space all the upper floor apartments would benefit from private balconies and ground floor units would have enclosed small private areas to the front of the units. These spaces met the Ebbsfleet design guidance for balcony sizes. The houses would have private gardens meeting the amenity space requirement within GBC SPD.
- 6.66 Regarding housing mix, within the whole of Harbour Village a 50/50 mix of houses and apartments is directed within the masterplan. The apartment block proposed in this RM application would provide 21no. one and two bedroom apartments, and 18no. three-bedroomed houses designed for 4, 5 and 6 occupants. Cumulatively, Phases 1A, 1B, 2, 3A and 3B would provide 567 dwellings and of these there would be 237 houses and 329 apartments. While this does not achieve the indicative 50/50 split between houses and apartments envisioned by the masterplan across the site, the masterplan clearly identified the Fastrack frontage and riverside as locations suitable for higher-density apartment-led development, rather than houses. In this context and having regard to the range of apartment and houses sizes provided, the proposed housing mix is considered acceptable.
- 6.67 The s106 agreement requires that, in addition to the Wheelchair Ready Units, at least 50% of the Affordable Housing dwellings and 25% of the open market dwellings are to be built in accordance with Building Regulations Part M4(2) 'Accessible and Adaptable Dwellings', to ensure that they are capable for adaption to meet the housing needs of those identified with mobility needs. The applicant confirms compliance with this requirement, and this can be secured by planning condition. No Part M4(3) 'Accessible and Adaptable Dwellings' (wheelchair dwellings) are required in Phase 3B as Phase 3A will provide 8no. units in Affordable Rent tenure, two in excess of the 6no. units required by the OPP S106 agreement.

Noise and Overheating

- 6.68 Gravesham LPCS Policy CS19 requires new development to be located, designed, and constructed to safeguard the amenity of neighbouring properties including privacy, daylight, and sunlight. These considerations also form part of the concern of the NPPF at paragraphs 135 and 198. The NPPF seeks to avoid granting consent for development which would give rise to significant adverse impacts on living conditions,

health and quality of life and mitigate and reduce adverse impacts arising from new development.

- 6.69 Whilst noise impacts were assessed at high level at the outline stage, the outline permission (OPP) requires each reserved matters submission to be informed by an updated noise assessment.
- 6.70 In this case the application site is located adjacent to an existing, unrestricted manufacturing operation on its western side (WE Roberts Ltd) as well as being within 250m of safeguarded operational wharf (Robins Wharf). The OPP has approved this strategic site as being suitable for residential development, and the site was allocated in the Local Plan for housing, however the details of the proposal must demonstrate no detriment to either the living conditions of future occupiers or the operational interests of existing businesses in the area will result. Paragraph 200 of the NPPF states that planning decisions should ensure new development would be integrated effectively with existing community businesses and that such businesses would not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where an existing business could have a significant adverse effect on new development, the agent of change (i.e. new development) should be required to provide mitigation before the development is completed.
- 6.71 As the site lies within 250m of safeguarded wharves and minerals infrastructure the proposal is required under Kent Minerals and Waste Local Plan Policy DM8 (Safeguarding Minerals Management, Transportation Production & Waste Management Facilities) to demonstrate that introducing new dwellings into this area would not adversely affect, nor force unreasonable restrictions on, the adjacent industrial uses or safeguarded minerals infrastructure. KCC Minerals and Waste Planning Team advise that the proposal has the potential to impact the existing industrial uses in the area, and significantly the mineral importation and related operations at Robins Wharf has potential to impact future occupants of the proposed development. In respect to assessment of impacts and any required mitigation measures they defer to the determining authority's Environmental Health Officer.
- 6.72 This application is therefore supported by an acoustic report, together with additional notes to provide clarification in response to officer queries and representations from the Port of London Authority (PLA) and the consultant appointed to represent the interests of Holcim Industries Ltd (Holcim) and Brett Aggregates Ltd (Brett).
- 6.73 The PLA and operators of the safeguarded wharves advised of concern in respect to the agent of change principle, particularly regarding Robins Wharf. They are concerned regarding a potential for noise complaints from residents and nuisance action which would have a negative effect on the safeguarded wharf operators and as a result restrain their activities.
- 6.74 The following noise sources have been identified as affecting the application site being from the following:
- Nearby industrial uses, including WE Roberts Ltd factory
 - Robins Wharf operations to the north-west of the site
 - Wharf 42 operations to the north-east of the site
 - Road traffic noise
 - Traffic noise from future Fastrack operation through the site
 - Noise from deliveries related to the retail unit
 - Future plant associated with the proposed development

- 6.75 Regarding internal noise within the proposed development, the applicant's acoustic report and technical notes conclude that noise from the nearby existing and committed industrial operations is unlikely to have an adverse impact on the proposed residential receptors subject to mitigation in the form of high-performing double glazing and the installation of Mechanical Ventilation Heat Recovery (MVHR) systems (in three facades of the apartment block and west facade of houses fronting College Road) so that windows can remain closed in overheating conditions. These mitigation measures are required to be secured by a planning condition.
- 6.76 However, the use of air source heat pumps (ASHP), as proposed, can increase noise impacts primarily through external units operating cumulatively at high capacity. The submitted NIA does not assess cumulative external noise from ASHP and MVHR and as such a planning condition is required to ensure this noise is sufficiently mitigated and a good living conditions for the residents.
- 6.77 Regarding external amenity noise levels, the noise levels on a number of external balconies may exceed the upper value of 55dBA. However, it is accepted that the proposed balconies are of relatively small area, and therefore their amenity use is unlikely to be for extended periods of the day. It is also taken into account that there are also alternative quieter external amenity locally available within walking distance of the affected residential buildings, including at Bevans Park. The GBC Environmental Protection Officer (EPO) agrees that the exceedances are not sufficient to refuse the scheme on noise grounds and the use of alternative nearby amenity areas is of benefit to future residents' improved amenity.

Agent of change – neighbouring businesses

- 6.78 In considering the agent of change principle and the potential impact of the proposal on existing neighbouring businesses, initial concerns were raised by the PLA, Holcim and Brett to the proposal and the Abacus Corner application. During the course of the application, and following further revisions and expansion of the submitted Noise Impact Assessment, these objections have been resolved. This resolution is subject to planning conditions requiring the incorporation of appropriate mitigation measures within the building design to address noise arising from road traffic, near-by industrial operations and the operational wharf. Subject to these suitably worded conditions, it is not considered that the grant of planning permission would engage the agent-of-change principle in a manner that would adversely constrain the ongoing operation of established neighbouring businesses.

Overheating

- 6.79 An Overheating Risk Assessment (ORA) report has been undertaken by the applicant based on the proposed scheme to review any overheating issues under Part O of Building Regulations. The report notes that the design and build of the development would be such that no mechanical cooling would be necessary to mitigate overheating – although some units will require MVHR to mitigate noise impact and allow windows to remain closed. As such, it is also considered to be sufficiently demonstrated that the development will achieve a comfortable living condition in respect to overheating for future occupants.
- 6.80 In summary, with respect to residential amenity for future with the use of suitably worded planning conditions the development would provide a good living condition for

future occupiers in relation to noise and overheating, and without detriment to the operation and interests of close-by industrial operators.

Residential Amenity – future occupiers and neighbours

- 6.81 The proposed houses and apartments would be adjacent to residential development within Phases 2 and 3A of Harbour Village to the south and east, the WER factory site to the west and the existing employment uses within the Abacus Corner employment site to the north. The apartment building would also front the Fastrack bus route with SUDS park on the opposite side of the road. However, the Abacus Corner existing employment site is subject to concurrent full application for redevelopment for residential use under reference EDC/25/0104, which has been designed as one development with this Phase 3B development. The two site boundaries overlap, as detailed in the committee report for the Abacus Corner full planning application.
- 6.82 Land levels across the Harbour Village site have been re-graded as part of the formation of the development platform, resulting in finished levels that fall gradually northwards towards the Fastrack road. The combination of this change in levels and relatively short rear garden depths gives rise to a small number of relationships between dwellings that are less than optimal by virtue of garden overshadow or outlook from one elevation of dual aspect rooms.
- 6.83 Such relationships are acknowledged to be less than ideal, but are similar to circumstances that arise in parts of earlier phases of the development and are very few in occurrence. On balance, it is relevant that future occupiers of the affected dwellings will purchase or rent the units with a full appreciation of the surrounding context, particularly as Phase 2 is currently under construction and the relationships will be readily apparent. Overall, the living conditions for future occupiers of the proposed development are considered acceptable, and for the majority of units would amount to a good standard of amenity, having regard to levels of privacy, daylight, outlook and the degree of mutual overlooking and overshadowing between the proposed and neighbouring development.
- 6.84 In relation to neighbouring commercial operations, the impact of the development upon their operation is most critically considered under the 'agent of change' section of this report.

Air Quality

- 6.85 Policy CS03 of the Gravesham LPCS seeks environmental improvements from new development, with particular emphasis on air quality within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, where particulate matter (PM10) levels have historically been elevated. Paragraph 199 of the National Planning Policy Framework requires development to comply with national air quality objectives and, where necessary, mitigate or improve local air quality conditions.
- 6.86 The Northfleet Industrial Area Air Quality Management Area (AQMA) was recently revoked following five years of compliance with national objectives, reflecting a sustained improvement in PM10 levels. Notwithstanding this, its revocation does not remove air quality as a material planning consideration, and assessment of potential impacts remains necessary.
- 6.87 The residential masterplan responded to air quality concerns by locating residential development adjacent to existing residential areas and over 200m from potential dust sources. The application for the approval of reserved matters accords with the

masterplan in this respect. In addition, the air quality impact from the proposed development to the surrounding area also needs to be appropriately mitigated. This includes dust generated during construction and traffic generation from new residents. Dust control measures are required to be detailed and agreed within the Construction Environmental Management Plan required for each phase of the development under outline planning condition 16. Discharge of that condition remains outstanding in relation to Phase 3B.

- 6.88 Regarding vehicle emissions the proposed EV charging provision within this phase also contributes to reducing traffic emissions.
- 6.89 In summary, subject to suitably worded planning conditions, the development is considered to provide a good level of residential amenity for future occupiers without adversely affecting existing neighbouring uses and to suitably ensure the living conditions of residential neighbours are not harmed, in accordance with Policy CS19 of Gravesham Local Plan Core Strategy and paragraphs 135, 196, 198, and 199 of the NPPF. Due to the changes in land levels through this area, the high density of development and small garden sizes it is recommended to restrict specific householder permitted development rights for the two houses within this development.

Heritage and Archaeology

- 6.90 At the outline application stage it was established that a site-wide Heritage Management Plan (HMP) should sit at the heart of the development, providing a framework to inform both the detailed masterplan and subsequent reserved matters applications. Condition 6(a) of the outline planning permission required the submission and approval of this site-wide HMP. The approved document sets out the overarching principles for the conservation and management of heritage assets across the site, and for their integration into the development. This includes commitments relating to the safeguarding of assets, the on-site display and interpretation of artefacts, local dissemination of heritage information, and arrangements for the recording and storage of finds. In addition, Condition 15 of the outline planning permission requires the submission of details relating to public art and heritage interpretation at reserved matters stage. The applicant has sought to discharge these requirements as part of the current reserved matters application.
- 6.91 A programme of archaeological work has been approved for the whole of the mixed-use application site under condition 20 of the OPP, and a programme of historic building recording has been approved for the residential area under condition 22. The approved details therefore cover the requirements within Phase 3B for archaeological watching brief and reporting during construction and recording of historic features.
- 6.92 Following discovery of cement industry remains within earlier phases of the Harbour Village development the KCC Heritage officers provided a brief for archaeological mitigation work, for which a methodology document (Written Scheme of Investigation: WSI) was subsequently submitted and approved by KCC Archaeology. These works were subsequently implemented and are currently ongoing (with many areas complete).
- 6.93 The KCC Archaeologist confirms that the archaeological fieldwork mitigation for Phase 3B has been completed and currently the applicant's archaeologist, RPS and Archaeology South-East, are currently undertaking post-excavation analysis and reporting, as part of work for the wider site. The County archaeologist advises that the location of heritage information boards and their content, with information about the

archaeology and history of the site, needs to be designed as part of a single exercise and not on a Phase-by-Phase basis. This is currently under review with EDC officers.

Sustainability

- 6.94 The NPPF (2024) confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Section 14 sets out policies to meet the challenge of climate change and identifies the planning system should support the transition to net zero by 2050 including at paragraph 161 through support of renewable and low carbon energy and associated infrastructure. Gravesham LPCS Policy CS18 seeks for new development to reduce water and energy usage, requiring development proposals to consider the potential for and include options for low carbon and renewable energy generation. Policy CSW3 of the Kent Minerals and Waste Local Plan Local Plan 2024 to 2039 requires all new development to be designed in accordance with circular economy principles which in part is to minimise the production of construction, demolition and excavation waste and manage any such waste arising during the development.
- 6.95 EDC's Sustainability Guidance (2024) sets out EDC's approach to assessing the sustainable performance of planning applications within the urban development area. It provides a clear and practical framework aligned with local policy, EDC's environmental ambitions, and industry best practice. The new assessment approach introduces two key tools: (1) performance tables that translate policy into measurable sustainability levels across areas such as Carbon & Energy, Water, Waste & Materials, Natural Environment, Health & Wellbeing, and Inclusive Growth; and (2) simple design guidance for key project types to support early integration of sustainable design principles. This methodology is intended to inform pre-application discussions, application documentation, and reporting to the planning committee, ensuring projects contribute to the ambitions of the Ebbsfleet Environmental Sustainability Framework.
- 6.96 Notwithstanding the above, it is relevant to note that the application was originally submitted in 2023, prior to the publication of EDC's Sustainability Guidance in 2024. As a result, the applicant has not provided a completed version of the EDC Sustainability Assessment performance tables. This reflects the fact that the scheme has been in development for a considerable period and has been informed by pre-application discussions that pre-date the introduction of the updated and more comprehensive assessment methodology and submission requirements. In these circumstances, it is not considered reasonable to expect full retrospective compliance with the new assessment framework for this reserved matters application.
- 6.97 This Reserved Matters application does however seek the discharge of condition 11 of the outline planning permission, which requires reserved matters applications to generally accord with principles included within the approved masterplan and the Sustainability Statement (Peter Brett Associates, 2009; David Lock Associates 2016) submitted for the outline planning permission.
- 6.98 The Energy and Sustainability Statement' ref. 332612492 V2 (Stantec dated July 2025) has been submitted in support of the application. The Statement has been prepared in accordance with the recognised energy hierarchy and outlines the applicant's approach to operational energy efficiency, water consumption and wider sustainability measures.
- 6.99 The development is underpinned by a fabric-first strategy, with building envelope performance exceeding the minimum requirements of Building Regulations Part L

(2021). Enhanced insulation standards, low air permeability targets and high-performance glazing are proposed, resulting in a substantial reduction in energy demand. The Statement confirms an ambition for all dwellings to achieve an EPC 'B' rating (with high performance towards 'A') through the combined effect of fabric efficiency, building services and renewable technologies.

- 6.100 The proposal is based on a fabric-first approach, with the applicant indicating that building fabric performance would exceed the minimum standards set out in Building Regulations Part L (2021). Measures include enhanced insulation, low air permeability targets and high-performance glazing intended to reduce energy demand. An all-electric heating strategy is proposed, incorporating air source heat pumps to houses, hybrid heat pump units and electric secondary heating to apartments, mechanical ventilation with heat recovery (where relevant) and low-energy lighting throughout. Indicative SAP modelling suggests a reduction in regulated carbon emissions of approximately 66% for houses and 71% for apartments when compared to the Part L 2021 Target Emission Rate. While this indicates compliance with current standards, the modelling is indicative and would be subject to detailed compliance at Building Regulations stage. Compliance with the proposed carbon reduction measures in the submitted report should be secured by condition. A planning condition is also required to agree the location and appearance of external ASHP units, to ensure their positioning is acceptable within the public view and an assessment of the cumulative noise from the ASHP and MVHR units to ensure a quiet living condition for residents.
- 6.101 Renewable energy generation is proposed in the form of roof-mounted photovoltaic panels located on the flat roofs of the apartment building, intended to serve landlord-controlled and communal areas only. In addition to the above the proposal would include a brown roof on the proposed apartment block. Although greater on-site renewable provision would generally be encouraged, the applicant relies primarily on demand reduction and efficient building services to demonstrate compliance with Part L. Final details of the PV installations would require further refinement and are recommended to be secured by condition.
- 6.102 The site lies within an area of recognised water stress, and the submitted strategy includes low-flow fittings, dual-flush WCs, water-efficient appliances and rainwater butts (for houses only). The resulting potable water consumption figure of approximately 109.7 litres per person per day would comply with Part G requirement of 110 litres per person per day, consistent with commitments set out in the approved residential masterplan. Subject to appropriate conditioning, the approach to water efficiency is considered acceptable.
- 6.103 The proposal seeks compliance with Building Regulations Part L 2021 rather than pursuing higher voluntary energy standards, which limits the extent to which the development can be considered to optimise sustainability outcomes at this stage. However, Building Regulations are expected to be updated through the Future Homes Standard, and any development not substantially completed would be required to comply with those revised standards.
- 6.104 In addition to its energy and water efficiency measures, the scheme incorporates a range of wider sustainability initiatives embedded within its layout, infrastructure and Travel Plan commitments. These include the provision of electric vehicle charging infrastructure, the promotion of sustainable modes of travel and placemaking, access to a car club, and comprehensive cycle facilities. Further sustainability benefits arise from the use of permeable paving and sustainable drainage measures, directing surface water runoff to the adjacent SuDS park. Additional sustainability credentials

include a target to the use of 100% sustainably sourced and/or certified timber and a target to divert at least 90% of non-hazardous construction waste from landfill are noted in the Energy and Sustainability Statement. Collectively, these measures enhance the overall sustainability credentials of the development, subject to their effective detailed implementation and ongoing management.

- 6.105 Subject to suitably worded further planning conditions the proposal complies with local and national policy and guidance with respect to low carbon and energy efficiency and condition 11 of the outline planning permission is discharged.

Flood Risk and Drainage

Flood Risk

- 6.106 Gravesham Local Plan Core Strategy Policy CS18 expects development proposals to reduce the overall local risk of flooding and demonstrate that they are adequately defended and safe over their lifetime. Policy CS19 seeks proposals to build in resilience to the effects of climate change, including protection against flood risk. Paragraphs 181 and 182 of the NPPF state that new development should not be at risk of flooding nor increase the risk of flooding elsewhere. Development should utilise sustainable drainage systems unless there is clear evidence that this would be inappropriate. Paragraph 181 of the NPPF requires, in part, planning applications to be appropriately flood resilient and with safe access and escape routes.
- 6.107 The Environment Agency's Flood Map for planning shows the Phase 3B site to lie within Flood Zone 1, having a risk of flooding in any year of 1 in 1000 (0.01%).
- 6.108 Condition 46 of the OPP requires the development to be carried out in accordance with the mitigation measures set out in the Flood Risk Assessment (FRA) submitted with that application. In particular, it requires finished floor levels to be set no lower than 7.2m AOD and located at least 15m from the landward toe of the flood defence. Subsequently, under the full planning permission (EDC/20/0147) for the formation of the development platform, this minimum finished floor level was increased following requirements from the Environment Agency, to ensure the platform would allow for the future provision of a continuous retreated flood defence with a crest level of 8.0m AOD. As this level exceeds the minimum requirement set out in the outline condition, the Reserved Matters application reflects the higher standard, with all proposed finished floor levels set no lower than 8.0m AOD. Notably, the minimum proposed finished floor levels would be 8.4m AOD and as such would meet the OPP compliance condition.
- 6.109 Condition 35 of the outline planning permission requires that new development in phases at flood risk are subject to a Flood Warning and Evacuation Plan. Proposed dwellings within Phase 3B would not be at flood risk and as such this condition does not apply in this context.

Surface Water Drainage

- 6.110 Surface flooding can result from periods of intensive rainfall, so it is important to ensure that any development incorporates appropriate drainage measures. NPPF paragraph 181 seeks provision of sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 6.111 The approved residential masterplan referenced an outline drainage strategy that directs surface water into Robins Creek, first passing through a forebay that is proposed to combine as a sustainable drainage feature within a publicly accessible

open space. Infiltration of surface water into the ground is not an option due to contamination arising from the former industrial uses of the site, and no existing surface water sewers are in the area as the former cement works discharged water direct to the River Thames.

- 6.112 Condition 23 of the OPP requires approval of a surface water drainage scheme prior to commencement of development within a phase. The current application does not seek to discharge this condition but a drainage layout of surface water, and foul water pipe layout, have been submitted confirming surface water will be directed via Robin's Creek to the approved SUDS basin and forebay. Without a formal application this drawing is for information only at this time in relation to layout and is not listed as an approved drawing.
- 6.113 However, the drainage layout addresses the whole development layout and therefore it is helpful to have sight of the intended drainage layout at this time. KCC LLFA confirm no objection to the illustrated surface water drainage scheme. Their assessment at reserved matters stage is whether the surface water provision is compliant with the outline planning permission. The Environment Agency have not objected to the illustrated scheme. However, Phase 3B cannot commence until the surface drainage scheme is formally approved, under the discharge of condition 23 of the OPP.

Foul Drainage

- 6.114 Pre-commencement condition 24 of the OPP requires approval of a foul water disposal to ensure adequate capacity within the network for the additional flows and protection of the existing drainage infrastructure. No formal application has yet been submitted for approval of condition 24 for Phase 3B, however, an illustrative drainage layout of surface water and foul water pipe layout for information purposes has been provided.
- 6.115 Southern Water advise that they have an agreement with the Independent Water Networks (IWNL) who are responsible for water supply and sewers at this location and without giving specific comment on the illustrated scheme they provide advice with respect to the requirements to meet agreement terms in place between Southern Water and the IWNL, and generic layout and construction advice. They also provide a plan of the existing infrastructure in the area.
- 6.116 In the absence of objection and subject to assessment of the proposals through the outstanding outline condition, the principle of the foul drainage proposal is considered acceptable and is therefore unnecessary to assess in detail as part the reserved matters.
- 6.117 The proposed development is considered acceptable in terms of flood risk without further planning conditions other than to approving drawings showing the FFL notes. The OPP drainage conditions remain to be discharged in respect to Phase 3B prior to the commencement of development.
- 6.118 Biodiversity and Ecology
- 6.119 Paragraphs 187 and 193 of the NPPF requires that biodiversity should be maintained and enhanced through the planning system. Gravesham LPCS Policy CS12 requires no net loss of biodiversity in the Borough, seeking opportunities to restore, re-create and maintain habitats.
- 6.120 Condition 8 (Detailed Masterplan) of the outline planning permission included the agreement of biodiversity measures in accordance with the approved Outline

Ecological Mitigation and Enhancement Strategy (condition 6(b) of the outline permission). These include commitment to:

- the inclusion of 1.5 hectares of green/brown roofs across the wider site (including in the residential area)
- identifying areas where lighting should be minimal, to avoid adverse impacts on foreshore ecology and habitats
- incorporation of bat and bird boxes into the design of the buildings

6.121 Approval of a Landscape and Ecological Management Plan prior to occupation of a particular phase is a requirement of a separate OPP condition (condition 32).

6.122 A reptile translocation exercise was completed in 2020 in accordance with the requirements of the OPP and the development platform works have been completed in accordance with the standalone planning permission (EDC/20/0147), which included requirements for ecological mitigation and an Ecological Watching Brief while the works being undertaken.

6.123 An Ecological Mitigation and Enhancement Strategy (EMES rev A) has been submitted for the phase with the application seeking to discharge condition 9(c) of the outline planning permission, which requires the EMES to be informed by the Outline Ecological Mitigation and Enhancement Strategy. Landscaping plans and indicative planting plans are also provided.

6.124 The submitted EMES advises that the site was cleared in 2020 as part of the development platform works and no significant natural regeneration of the site has occurred since that time. As such the report proposes that in the unlikely event that further vegetation clearance is required it would be carried out to avoid bird nesting season or checks to ensure no nesting birds if during nesting season. The strategy details the installation of: 3 integrated bird boxes, 3 bat boxes and two log piles as well as a brown roof on the apartment building roof.

6.125 The KCC Ecologist advises the mix of native and non-native plants within the indicative planting plan will benefit biodiversity. Ideally there would be provided a higher number of integrated nest boxes but the overall BGN increase is very significant and the proposed boxes are accepted.

6.126 Condition 8(t) of the outline planning permission requires the submission of external lighting in the public realm whilst condition 47 requires that no lighting shall be installed, excluding street lighting or temporary construction lighting, until it has been agreed with the Local Planning Authority. As such a 'Proposed Street Lighting Layout' drawing has been submitted, including within the parking courts and pedestrian path from College Road. The scheme utilises galvanised columns, including in parking courts.

6.127 The KCC Ecologist has reviewed the submitted documents and advise that the light spill is contained within the site other than on the northern boundary as part of the cumulative street lighting design with the proposed Abacus Corner development (EDC/25/0104). They also recommend that the lighting follows the KCC highways dimming regime (regardless of whether it is adopted or not), where residential roads typically are on a minus 40/60% dimming regime so dim by 40% between the hours of 20:00 – 22:00 and then dim by minus 60% between the hours of 22:00 to 05:00. The dimming of the lighting will further reduce light spill which will benefit both nocturnal animals and residents. These comments have been provided to the applicant for information. The proposed lighting scheme should be secured by planning condition.

- 6.128 Condition 16 of the outline planning permission requires the pre-commencement agreement of a Construction Environmental Management Plan (CEMP) for the residential area, including Phase 3B, and was approved under condition application EDC/21/0078. This includes ecological protection measures to be undertaken during construction.
- 6.129 Also, having regard to its duty under s.28G of the Wildlife and Countryside Act 1981 (as amended) it is not considered that the determination by EDC of this application would or is likely to affect the flora, fauna or geological or physiographical features by reason of which a site of special scientific interest is of special interest.
- 6.130 The ecological impact of the proposed development is therefore considered acceptable and safeguarded through conditions for ecological enhancements, as agreed by KCC in their role as the LPA's ecological advisor.

Building for a Healthy Life Assessment

- 6.131 BFHL is a design tool to measure and assess good design for new homes that is supported by the housebuilding and architectural industries as well as Government and Local Authorities. A BFHL assessment of the scheme has been undertaken by EDC officers and results are summarised below:

Integrating the neighbourhood

1 Natural Connections	2 Walking, cycling and public transport	3 Facilities and services	4 Homes for everyone
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Distinctive Places

5 Making the most of what's there	6 Memorable Character	7 Creating well defined streets and spaces	8 Easy to find your way around
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Streets for all

9 Healthy Streets	10 Cycle Parking and Car Parking	11 Green and Blue Infrastructure	12 Back of footpath-front of house
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BFHL Assessment

- 6.132 The proposed development performs well overall against the BFHL assessment, with amber scores limited to a small number of specific design matters. Category 6 (Memorable Character) reflects concerns that the side elevations of the corner-turner house types (T02, T03 and T04) lack sufficient articulation along the east-west street, and that while house types T05 and T08 are intended as local landmarks, their enhanced use of contrasting black weatherboarding results in a degree of architectural incongruity with the wider residential typologies. Category 10 (Car and cycle parking) relates to the failure to provide the required 20% visitor parking provision. Category 11 (Green and Blue Infrastructure) identifies the hardening effect of in-line on-street parking spaces and extensive hard surfacing to the eastern façade of the apartment block, where multiple entrances and refuse stores limit opportunities for landscaping. Consolidation of these elements would allow for enhanced planting and a softer streetscape and building frontage.

- 6.133 Overall, the scheme performs well achieving 9 out of 12 greens. The results of the BFHL assessment are therefore acceptable.

Other Considerations

Public Art and Heritage Interpretation

- 6.134 The applicant is also seeking to discharge Condition 15 of the outline planning permission insofar as it relates to this phase of development. Condition 15 requires the submission of details relating to the design and maintenance of the public realm, together with the provision of public art and heritage interpretation and an associated timetable for installation.
- 6.135 No phase-specific proposals for public art or heritage interpretation have been submitted as part of this reserved matters application. For Phase 3A, the approved Design and Access Statement identified opportunities for integrated or “embedded” public art, particularly along the riverside promenade where there is a clear public focus and strong pedestrian movement. In contrast, Phase 3B comprises a more inward-looking residential environment and does not contain areas of sufficient prominence, footfall or spatial focus to reasonably accommodate public art or heritage interpretation features in a meaningful or legible way. It is therefore accepted that the objectives of Condition 15 would be more appropriately met within adjacent phases or locations across the wider Harbour Village development, where more suitable and publicly accessible settings are available. On this basis, and having regard to the overall site-wide approach secured through the outline permission, this element of Condition 15 is considered to have been satisfactorily addressed and can be regarded as discharged in respect of Phase 3B.

Environmental Impact Assessment (EIA) -

- 6.136 The outline permission was identified as being EIA development and the likely significant effects of the development on the environment were identified and assessed at the time of the outline application. If effects arising from the proposals set out in an application for approval of reserved matters were not identified or identifiable at the time of a decision to grant outline planning permission and were therefore not assessed at the time of that decision, then an assessment must be undertaken at the reserved matter stage.
- 6.137 However, it is EDC officers' opinion that all likely significant environmental effects were identified and assessed as part of the outline permission application process and that the information before the planning authority is adequate to assess the significant effects of the development on the environment, and therefore it is not necessary to serve a notice seeking further environmental information.

Habitats Regulation Assessment -

- 6.138 Projects likely to have a significant effect upon a protected site are to be subject to an Appropriate Assessment of their implications for the Site in the context of its conservation objectives, provided that the project is not directly connected with or necessary to the management of the protected site.
- 6.139 The proposed development is located within 6 kilometres of the South Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar Site, both European Sites

designated due to important assemblages of wintering water birds. The proposed development is not connected with and not necessary for the management of the European sites. It is considered likely that the development will impact upon the protected sites and therefore it is necessary to undertake an appropriate assessment of the implications of the proposed development, including cumulative effects of other committed developments, on the European sites in view of their conservation objectives.

- 6.140 An assessment of the likely impacts from the development was undertaken at the time of the outline permission in connection with the proposed mitigation measures. The s106 agreement sets out mitigation measures in the form of an obligation to pay, prior to commencement of a development phase, a tariff based financial contribution to the Strategic Access Management and Monitoring Strategy (SAMMS) per dwelling, which pools money from local authorities to spend on measures to mitigate recreational disturbance as a result of new development. Having regard to indexation, the current tariff for 2026/27 is £350.16 per dwelling.
- 6.141 Following subsequent judicial clarification of the legal position, it is now established that the requirement for an Appropriate Assessment cannot be screened out on the basis of the mitigation measures proposed. In this circumstance, to ensure legal compliance, an Appropriate Assessment is required to be undertaken at the reserved matters stage. In the context of this application for approval of reserved matters EDC officers have carried out an Appropriate Assessment in order to assess whether any adverse impact on the integrity of the Thames Estuary and Marshes SPA can be ruled out. The Appropriate Assessment concludes that, taking into account the mitigation measures proposed in the s106 agreement, the proposal will not adversely affect the integrity of the Thames Estuary and Marshes SPA and Ramsar site.
- 6.142 The s106 has been completed and is enforceable against the land. A separate unilateral undertaking from the applicant for the payment of the contribution is therefore unnecessary.

Contamination -

- 6.143 Policy CS19 of the Gravesham Local Plan Core Strategy requires new development to avoid adverse environmental impacts including land contamination and unacceptable risk or harm to the water environment. Paragraph 196 of the NPPF requires that planning decisions should ensure that new development is appropriate for its location and takes account of the likely effects of pollution on health, living conditions and the natural environment and that the proposed site is suitable for its proposed use that decisions should ensure that taking account of ground conditions and any risks arising from land instability and contamination and requires '*adequate site investigation information, prepared by a competent person...*'. Paragraph 197 states that '*Where a site is affected by contamination or land instability issues, responsibility for securing a safe development rest with the developer and/or landowner.*'
- 6.144 The site lies within Groundwater Source Protection Zone 2 (Outer Protection Zone). Condition 18 of the outline planning permission requires a contaminated land assessment to be submitted *prior to the commencement of development on any phase of development*, including a desk study of previous uses, a site investigation strategy, and if required a remediation strategy. The requirements of the outline planning permission, which includes a separate pre-occupation condition requiring approval closure report, are considered sufficient to ensure the site would be suitable for the proposed use.

Marine Plans -

- 6.145 Paragraph 183 of the NPPF requires that *“In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.”* Whilst not part of the Development Plan, Marine Management Policies are material planning considerations.
- 6.146 The site is located in close proximity to the River Thames and subject to the South-East Inshore Marine Plan which is regulated by the Marine Management Organisation (MMO), and the policies therein.
- 6.147 Following assessment, it is not considered that the proposal will result in any unacceptable impact on the coast, most particularly Policy SE-PS-1 related to impact upon current activity of port and harbour activities, Policy SE-HER-1 related to the conservation and enhancement of coastal heritage assets, through archaeological investigation and the installation of heritage interpretation, SE-ACC-1 and SE-TR-1 which relate to inclusive public access to and future tourism and recreational activities within the marine area, as seen in this proposal by the PROW diversions diversion to run through the riverside park within Harbour Village, SE-CC-2 that proposals demonstrate they are resilient to the effects of climate change, in this case through incorporation of flood resilience and sustainability measures and SE-DIST-1 which relates to mitigation of recreational activities on highly mobile (migratory) species through the SAMM payment secures in the original S106.
- 6.148 As such the proposal is considered to comply with the relevant Marine Plan policies and paragraph 183 of the NPPF.

7.0 FINANCIAL CONSIDERATIONS

- 7.1 Regard should be had to any local finance considerations in so far as material to an application for planning permission and, while this is not material to this application for the approval of reserved matters, financial benefits will accrue to the area if permission is granted. The Government wishes to ensure that the decision-making process for major applications is as transparent as possible, so that local communities are more aware of the financial benefits that development can bring to their area. In this area, although not material to the application, the following benefits to the public purse accrue from development - New Homes Bonus (which is a local finance consideration), Council Tax for new dwellings, and the delivery of Affordable Housing.

8.0 HUMAN RIGHTS

- 8.1 The application has been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation below, is compatible with the Act.

9.0 PUBLIC SECTOR EQUALITY DUTY

- 9.1 The Equality Act 2010 (Equality Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 9.2 In determining this application, regard has been had to the duty as set down in section 149 of the Equality Act, in particular with regard to the need to –
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.3 The scheme has been assessed with regard to the Equality Act 2010, including the Public Sector Equality Duty under Section 149. In determining the application, the Local Planning Authority has considered how the proposals promote equality of opportunity and minimise disadvantage for those with protected characteristics.
- 9.4 The proposals include a range of inclusive design measures addressing matters of equality to minimise disadvantage, such as an inclusive and accessible public realm, and safe pedestrian routes that allow for informal congregation; accessible distances throughout the development to the Fastrack bus services; the inclusion of tactile paving within the pedestrian network; car parking spaces that are designed to be able to be adapted to provide for dedicated disabled parking provision, should future demand require it. In addition, the development incorporates the provision of 59% of dwellings built to M4(2) standards. On this basis, officers are satisfied that equality considerations have been properly taken into account in the assessment of the application.
- 9.5 It is therefore considered the application proposals would comply with objectives of the Duty.

10.0 CONCLUSION

- 10.1 Subject to the completion of the planning conditions as proposed, the proposals are considered to broadly accord with the principles and parameters established by the outline planning permission, detailed residential masterplan and local and national planning policies, and to be aligned with the Ebbsfleet Implementation Framework. They would form part of the third phase of residential development to meet EDC's aspirations for Northfleet Riverside with a high-quality residential development.
- 10.2 The proposed development performs well against the Building for a Healthy Life topics (achieving 9 greens, 3 ambers and no reds) which reinforces the conclusion that the proposals are acceptable.
- 10.3 The application is therefore recommended for approval subject to imposition of the planning conditions listed in the officer recommendation.