

Agenda Item 5

Reference: EDC/25/0104

Site Address: Abacus Corner, Land East of College Road and South of The Creek, Northfleet, Kent DA11 9AU

Proposal: Full planning application for the demolition of existing buildings and the redevelopment of the site for 68no. residential units (Class C3) and highway to support Fastrack bus route, together with associated parking, access, private amenity areas, public realm, hard and soft landscaping, biodiversity enhancements and associated infrastructure following demolition of existing buildings on the site.

Applicant: Bellway Homes Limited (Thames Gateway)

Parish / Ward: Northfleet and Springhead

SUMMARY:

This application seeks full planning permission for the redevelopment of the Abacus Corner existing employment site together with adjoining and nearby land within College Road, delivering 68no. dwellings (66no. apartments and 2no. houses), including 20no. affordable homes (29.4% Discount Market Sales tenure), alongside a strategic section of the Fastrack bus route.

The applicant has brought forward the scheme as a logical extension to the adjoining Harbour Village development, adopting the same “vision objectives” creating a sustainable neighbourhood, reflecting and celebrating the site’s industrial heritage, creating a cohesive network of streets and open spaces, providing a range of new homes and creating a waterfront destination with connections to the River Thames. As such, the layout delivers a strong street hierarchy that frames views across and through the site, establishing visual links to the River Thames and across Northfleet. The character and appearance draws from the approved character typologies of surrounding Harbour Village Phases to create a cohesive development, reinforcing local heritage and reacting to the site’s location opposite the riverside SuDS (Sustainable drainage systems) park to the north and its position as a ‘gateway’ into Harbour Village, along the Fastrack route.

The proposals perform well when assessed under Building for a Healthy Life. All dwellings meet the Nationally Described Space Standard, with 90% achieving Building Regulations Part M4(2) Accessible and Adaptable Dwellings, ensuring a high level of residential quality. Building Regulations Part L (2021) will be achieved as a minimum standard, although estimated annual performance measures indicate an uplift in dwelling performance above some Part L standards (CO2 emissions 73% reduction, Fabric Energy Efficiency 20% reduction and Primary Energy 46% reduction). This is achieved through a fully electric energy strategy (air source heat pumps), photovoltaic panels to apartment buildings, enhanced building fabric, MVHR systems, aligning with the transition toward the Future Homes Standards. Bio-diverse brown roofs and electric vehicle charging infrastructure are also proposed.

A sustainable transport led approach is embedded into the design, with buildings orientated towards public transport and providing strong links to open spaces and surrounding green infrastructure, and a safe and attractive living environment for future residents. 36no. apartments are proposed as ‘car-free’ units, a concept introduced to the Harbour Village development in Phase 3A. While visitor parking levels are low this follows the general

approach adopted across Harbour Village and complies when the EDC Sustainable Travel Strategy. The visitor parking proposals rely on re-provided and additional parking being secured within the College Road public highway through the use of a Traffic Regulation Order amendment, secured by legal agreement and Grampian conditions.

Overall, the application delivers on Garden City principles, providing well-designed homes alongside high-quality affordable units in an intermediate tenure. It represents a carefully considered scheme which accords with national and local policy and many of the objectives of the Ebbsfleet Implementation Framework. The development will contribute meaningfully to housing delivery within Ebbsfleet and, importantly, facilitates the provision of a critical section of the strategically significant Fastrack bus route through Northfleet Riverside, supporting sustainable growth and connectivity.

It should be noted that this application is interdependent with application EDC/23/0078 (Harbour Village Phase 3B) in relation to: the two site boundaries materially overlap; access for vehicles, pedestrians and cyclists from Phase 2 to the western part of this site travel through the Phase 3B site using infrastructure only within that 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 this application, intrinsically relate to the development layout (parking spaces for the house fronting College Road) proposed under Phase 3B; KCC Highways advise both developments would depend on the visitor parking spaces being provided within College Road proposed under this 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 grant planning permission, subject to:

- (i) Imposition of the following planning conditions and informatives, with delegated authority to the Director of Planning & Place to make minor changes to the wording; and
- (ii) Completion to the satisfaction of the Ebbsfleet Development Corporation as Local Planning Authority of a deed of planning obligation under section 106 of the Town and Country Planning Act 1990 (as amended) in general accordance with the schedule of Draft Heads of Terms as set out in Appendix 1 of this report.

CONDITIONS:

Time Limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

Approved Plans and Documents

2. The development hereby permitted shall be carried out in accordance with the following plans:

Site Plans:

Drawing No.ABC-BPTW-S01-XX-DR-A-0101 rev C02 – Site Location Plan

Supporting Drawings:

ABC-BPTW-S01-04-DR-A-0144 rev C05 – Proposed Site Layout – Roof
ABC-BPTW-S01-00-DR-A-0140 rev C05 – Proposed Site Layout – Ground Floor
009 Rev 006 – Abacus Corner – Fast Track Visibility
ABC-BPTW-S01-XX-DR-A-0152 rev C05 – Proposed Site Layout – Refuse Strategy
ABC-BPTW-S01-00-DR-A-0140 rev C04 – Proposed Site Layout – Cycle Strategy
ABC-BPTW-S01-XX-DR-A-0150 rev C05 – Proposed Site Layout – Parking Strategy
2401/04/3000 Rev E – Drainage Strategy
2401/04/3001 rev B - [Drainage] Catchment Area
ABC-BPTW-S01-XX-DR-A-0153 rev C01 – Proposed Site Layout – Dwelling
Accessibility

Floor Plans:

ABC-BPTW-T01-ZZ-DR-A-1020 rev C01 – Terrace 01 – GA Plans
ABC-BPTW-B03-04-SK-A-1009 rev C03 – Block 03 – Roof Plan
ABC-BPTW-B03-03-SK-A-1008 rev C04 – Block 03 – Third Floor Plan
ABC-BPTW-B03-01-AK-A-1007 rev C03 – Block 03 – Typical Floor
ABC-BPTW-B03-00-SK-A-1006 rev C04 – Block 03 – Ground Floor Plan
ABC-BPTW-B01-04-SK-A-1006 rev C05 – Block 01 and 02 – Roof Plan
ABC-BPTW-B01-03-SK-A-1004 rev C04 – Block 01 and 02 – Third Floor Plan
ABC-BPTW-B01-01-SK-A-1003 rev C04 – Block 01 and 02 – Typical Floor Plan
ABC-BPTW-B01-00-SK-A-1002 rev C05 – Block 01 and 02 – Ground Floor Plan

Elevations:

ABC-BPTW-T01-ZZ-DR-A-2020 rev C02 – Terrace 01 – Elevations
ABC-BPTW-B03-ZZ-SK-A-2011 rev C04 – Block 03 – Elevations
ABC-BPTW-B01-ZZ-SK-A-2010 rev C04 – Block 01 and 02 – Elevations

Sections:

ABC-BPTW-B03-ZZ-DR-A-2221 rev C03 – Block 03 – Sections
ABC-BPTW-B01-ZZ-DR-A-2220 rev C04 – Block 01 and 02 – Sections

Street Elevations:

ABC-BPTW-ZZ-ZZ-DR-A-2031 rev C04 – Street Elevations
ABC-BPTW-ZZ-ZZ-DR-A-2030 rev C04 – Street Elevations

Site Levels:

2401/04/7000 rev D – Levels Strategy

Landscape Details:

13281-LUC-AC-XX-DR-L-0003 rev P05 – Landscape Proposals Soft Landscape Plan
13281-LUC-AC-XX-DR-L-0002 rev P05 – Landscape Proposals Illustrative Plan
13281-LUC-AC-XX-DR-L-0001 rev P10 – Landscape Proposals General Arrangement

Reason: For avoidance of doubt and to ensure a satisfactory form of development.

Pre-Commencement Conditions

3. **Legal Agreement** - No part of the development hereby approved shall commence until all parties with a relevant enforceable legal interest in Development Zone 2 (the extents

of which are as identified on drawing S106 Land Ownership Plan ABC-BPTW-S01-XX-DR-A-0104 Rev C02) have entered into a planning obligation or planning obligations with the Local Planning Authority pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) in substantial accordance with the s.106 Heads of Terms document reference Document 001.

Reason: Development must not commence until all relevant legal interests in these parts of the site are bound under the Section 106 Agreement to ensure that the development hereby approved is acceptable in planning terms in accordance with Policy CS10 of the Gravesham Local Plan Core Strategy.

4. **Surface Water Drainage Scheme** – No part of the development hereby approved shall commence until a detailed sustainable surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The detailed drainage scheme shall be based upon by the ‘Flood Risk Assessment’ (RLT Ltd, ref. 240104 rev B, dated 24 February 2026). The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100-year storm) can be accommodated and disposed of without increase to flood risk on or off-site. The drainage scheme shall also demonstrate (with reference to published guidance):
- (a) any effects of tide-locking of the outfall and the impact of the additional run-off upon the existing basin’s functionality have been adequately considered;
 - (b) that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters; and
 - (c) appropriate operational, maintenance and access requirements for each drainage feature or Sustainable drainage systems (SuDS) component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The approved drainage scheme shall thereafter be implemented in full accordance with the approved details prior to any part of the approved development first being brought into use.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development a copy of as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development and in accordance with Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy and paragraphs 173, 181 and 182 of the National Planning Policy Framework.

5. **Contamination Risk Assessment** - No part of the development hereby approved shall commence until the following components of a scheme to deal with the risks associated with contamination of the site have been submitted to and approved in writing by the Local Planning Authority:
- (i) A preliminary risk assessment which has identified; all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; potentially unacceptable risks arising from

contamination at the site. The assessment must encompass an assessment of risks posed by radon and by ground gas.

- (ii) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- (iii) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- (iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall thereafter be implemented in full accordance with the approved details,.

Reason: To ensure development addresses issues related to historic contamination of the site in line with current planning guidance. To assess and mitigate potential risks to controlled waters, including the nearby creek and groundwater in the underlying principal aquifer, and future and neighbouring occupiers in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and paragraph 196 of the National Planning Policy Framework.

6. **Archaeology Investigation** - No part of the development hereby approved (including below-ground obstruction removal) shall commence until the applicant, or their agents or successors in title, has secured the implementation of:

- (a) archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority; and
- (b) following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded in accordance with Policy CS20 of Gravesham Local Plan Core Strategy, Policy TC7 of the Gravesham Borough Local Plan First Review and paragraphs 207 and 214 of the National Planning Policy Framework.

7. **Construction and Environmental Management Plan** - No part of the development hereby approved shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include as a minimum:

- (a) Methodology for the removal and storage of the TS Sturge plaque which is embedded within the existing retaining wall of the site;
- (b) Construction phasing;
- (c) Routing of construction and delivery vehicles to / from site;
- (d) Parking and turning areas for construction and delivery vehicles and site personnel;
- (e) Temporary traffic management / signage;
- (f) Permitted construction traffic arrival and departure times;
- (g) Timing of construction related deliveries;

- (h) Hours of working on the site;
- (i) Details of wheel washing facilities;
- (j) Measures to prevent the discharge of surface water onto the highway;
- (k) Dust control measures;
- (l) Proposed flood-risk prevention measures during construction; and
- (m) Temporary construction lighting including measures in relation to bats.

Thereafter all demolition and construction activity in respect of the development shall be undertaken in full accordance with the approved CEMP.

Reason: To mitigate any adverse impact from demolition and construction on the local highway networks and to protect the amenity of local businesses, neighbours and wildlife and to mitigate the risks to groundwater, in accordance with DfT Circular 01/2022, Gravesham Local Plan Core Strategy Policies CS11, CS12 and CS19 and paragraphs 115, 135 and 187 of the National Planning Policy Framework.

Informative: The Air Quality Assessment (Final) (Stantec, February 2026) has scoped out Non-Road Mobile Machinery (NRMM) by stating that NRMM will adhere to the Road Vehicles and Non-Road Mobile Machinery (Type-Approval) (Amendment and Transitional Provisions) (EU Exit) Regulations 2022 (Statutory Instrument, 2022). This matter should be addressed in the CEMP submission.

Informative: The TS Sturge plaque that is to be removed from its current location within the site should be relocated within the site, as part of the agreement of public art details within the public realm. The plaque should be referenced within the series of heritage interpretation boards to be agreed from the wider Harbour Village development, to which this development would operate as an extension.

8. Biodiversity Method Statement (demolition, clearance and construction) - No part of the development hereby approved shall commence until a site-wide Biodiversity Method Statement (BMS) has been submitted to and approved in writing by the Local Planning Authority. The BMS shall be prepared in accordance with clause 10 of BS 42020:2013 ('Biodiversity – Code of practice for planning and development'), or any superseding British Standard. The BMS shall be based on up-to-date ecological survey information, as advised by a suitably qualified ecologist and include the following:

- (a) a risk assessment of potentially damaging demolition, clearance and construction activities;
- (b) identification of biodiversity protection zones;
- (c) mitigation method statements;
- (d) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during demolition, clearance and construction;
- (e) the location and timing of sensitive works to avoid harm to biodiversity features, including protective fences, exclusion barriers and warning signs;
- (f) the times during construction when specialist ecologists need to be present on site to monitor works to ensure compliance with the CEMP, and the actions that will be undertaken;
- (g) any licensing requirements;
- (h) responsible persons and lines of communication; and
- (i) the role and responsibilities on site of an ecological clerk of works or similarly competent person.

The most recently approved BMS shall be adhered to and implemented throughout the demolition, clearance and construction phase of the development.

Reason: To ensure suitable management and mitigation of ecological and biodiversity interests during demolition, clearance and construction phases in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy and paragraphs 187 and 193 of the NPPF.

Prior to Development Beyond Site Clearance and Demolition

9. **TRO Parking in College Road** - No part of the development hereby approved, except site clearance and demolition works, shall commence until a copy of Traffic Regulation Order (TRO) amendment, approved by the Local Highway Authority, to provide the 6no. visitor parking spaces within the College Road public highway as shown on drawing ABC-BPTW-S01-XX-DR-A-0150 rev C04 (Parking Strategy), has been supplied to the Local Planning Authority. Thereafter the development shall not be occupied until the requirement of the agreed and supplied TRO amendment have been carried out in full.

Reason: To provide parking being relied on for the development, to facilitate refuse/emergency vehicle adequate access to wider Harbour Village and in the interests of highway safety to accord with Policy CS11 of Gravesham Local Plan Core Strategy, Policies T1 and T5 of the Gravesham Borough Local Plan First Review and paragraph 115 of the National Planning Policy Framework.

Prior to Installation of Underground Services

10. **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. The submitted details shall demonstrate that no conflicts will arise between underground utilities and tree roots and shall confirm the meter box termination locations for all relevant dwellings. 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 13281-LUC-AC-XX-DR-L-0003 rev P05 (Soft Landscape Plan) 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

11. Lighting Impact from WE Roberts Site - Notwithstanding the submitted lighting assessment, no development above foundation level shall take place until a scheme of the mitigation measures to address external light intrusion/glare from the WE Roberts Ltd operations has been submitted to and approved in writing by the Local Planning Authority. The mitigation measure(s) shall address all apartments in block B01 (as shown on drawing ABC-BPTW-S01-00-DR-A-0140 rev C04 (Proposed Site Layout - Ground Floor)) with bedrooms utilising sole west facing windows. The mitigation measures should be able to demonstrate that light intrusion at those west facing bedroom windows are below 25 lux pre-23:00 and below 5 lux post 23:00 to 07:00 in line with the relevant limits for Environmental Zone E4 as set out in the Institute of Lighting Professionals (ILP) 'Guidance notes for the Reduction of Obtrusive Light' 2021. The approved mitigations shall be implemented in full prior to the occupation of the relevant apartments.

Reason: To ensure glare from adjacent industrial operations will be suitably mitigated to ensure a good living condition for future occupiers in accordance with Policy CS19 of Gravesham Local Plan Core Strategy and paragraphs 198 of the National Planning Policy Framework.

12. Architectural Detailing - Notwithstanding the details submitted with the application, no development above foundation level shall take place until details and samples of the materials (if requested by the Local Planning Authority) for the house types, apartments for the following elements have been submitted to and approved in writing by the Local Planning Authority:

- (a) Architectural detailing (at scale 1:20) including:
- (i) Details of each envelope / roof type specifically cross section through a balcony bay and associated French-door including feature pediment on north elevation Block 01 /02
 - (ii) Details of balconies and terraces including plans, sections and elevations detailing structure, soffits, kickboards, downpipe drainage, and floor finishes demonstrating level accessible thresholds to all apartments
 - (iii) balustrading, soffits and canopy details: (Plans and cross sections through each projecting balcony type and Juliet balconies)
 - (iv) Details of each envelope / roof type specifically cross section through each house type
 - (v) Head, jamb and sill details, including profiles, for each type of openings and all ground floor entrances and doors to balconies / terraces
 - (vi) Details (including mortar joint profile) for each brick element / type of feature brickwork including panels between windows on upper floors, roof pediments, and ground floor projecting courses
 - (vii) Key junctions/bonds between materials/finishes
 - (viii) Details of glazing and curtain walling systems including any manifestation
 - (ix) Parapets, roof edges, rooftop plant screening, lift over runs etc
 - (x) Details of any screens / gates to boundaries and to car parking area, garages and structural ties to balconies
- (b) Architectural detailing (at scale 1:50) including:
- (i) Lower Ground Floor frontages including communal entrances, wall facade/sections, signage zones, infill panels on plant rooms/bike stores etc.
 - (ii) Building name signage.

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

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.

13. **Materials** - No development above foundation level shall take place until details and a schedule of all materials and products to be used externally, along with material sample boards and/or full-size mock-ups where requested by the Local Planning Authority, have been submitted to and approved in writing by the Local Planning Authority. These shall include (but are not limited to):

- (a) Sample panel of all feature brickwork including mortar joint profile;
- (b) Sample of window / door types (including finishes, glass types and any manifestation); and
- (c) Details of items which are fixed / integrated to the façade (eg fins/louvres, vent grilles, rainwater pipes, bird/bat boxes)

Sample panels of facades shall be provided with details and sizes to be agreed with the Local Planning Authority in advance. The development shall be carried out in accordance with the approved details and implemented in full prior to the first occupation/use of the building to which they relate and shall be retained thereafter.

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.

14. **Heritage Interpretation** - No development above foundation level shall take place until the archaeological post-excavation assessment and analysis required pursuant to condition 6 has been completed and details of the proposed heritage interpretation measures for this development, including on-site relocation of the retained TS Sturge plaque, have been submitted to and approved in writing by the Local Planning Authority. **Details shall include the location of interpretation boards, design of boards structures, content of boards information. If a heritage interpretation board is agreed to be located within the site** then the agreed board shall be installed in accordance with the approved details prior to first use of the public realm/highway area in which it is to be located by members of the public and shall then be retained at all times.

Reason: To ensure that the development creates a high-quality environment through design and layout of open spaces and public realm in accordance with the principles of Kent Design and Policy CS20 of the Gravesham Local Plan Core Strategy.

Informative: As agreed with KCC Heritage, heritage interpretation measures for this site are expected to be co-ordinated as part of the site wide heritage interpretation strategy for the wider Harbour Village development, for which this development will form an extension.

15. **Hard Landscaping** - No development above foundation level shall take place until details and samples of proposed hard surfacing materials have been submitted to and approved in writing by the Local Planning Authority. These details shall substantially accord with the details illustrated and annotated on the approved drawings and include the following details:

- (a) details of any proposed earthworks and proposed finished levels or contours including any alterations in existing ground levels
- (b) surface details and demarcation of vehicle parking spaces details of other vehicle and pedestrian access and circulation areas including cycle storage
- (c) details of inclusive design including external steps and ramps, tactile warning or wayfinding paving, mobility features and dropped kerbs
- (d) hard surfacing materials, including dimensions, bonding and pointing.

The development shall be carried out in accordance with the approved details and implemented in full prior to the first occupation/use of any dwelling/building to which it relates and shall thereafter be maintained in accordance with the approved Landscape and Ecological Management Plan, required within condition 9, at all times.

Reason: In order to ensure an acceptable and functional standard of development upon completion, and in the interests of visual amenity, in accordance with Gravesham Local Plan Core Strategy Policy CS19

16. Landscaping (public realm terrace materials samples) - Notwithstanding the details submitted with the application, no development above foundation slab level of the apartment blocks hereby approved shall take place until sample panels and products for the following have been submitted to (and/or reviewed on site) and approved in writing by the Local Planning Authority:

- (a) Sample products or in situ cast-panel for the concrete retaining walls between blocks 2 and 3 within the stepped plaza space (to verify the colour and finish); and
- (b) Sample of all proposed pavers (to verify colour and finish in relation to the colouring of external landscape concrete walls).

The development shall be carried out in accordance with the approved details and implemented in full prior to the first occupation/use of any dwelling/building to which it relates.

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.

17. Soft Landscaping – Notwithstanding drawing 13281-LUC-AC-XX-DR-L-0003 rev P05 (Soft Landscape Plan) no development above foundation level shall take place until a revised soft landscape plan updating the extent of the use of the ‘Fastrack Frontage’ planting mix 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
- (c) coordination drawing of all biodiversity enhancements including habitats and items such as bird/bat boxes, swift/bee bricks with specifics on the species anticipated to use these elements based on the ecological strategy and survey.

Thereafter the approved soft landscaping scheme for the site shall be carried out in full during the first available planting season following first occupation/use of the dwelling/building to which it relates, and thereafter managed and maintained in accordance with the approved Landscape and Ecological Management Plan.

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: In order to ensure an acceptable and functional standard of development upon completion and that new planting becomes established and to maintain a high quality of visual amenity within the area in accordance with Gravesham Local Plan Core Strategy policy CS19.

Informative: An extension of the use of the 'Fastrack Frontage' planting mix illustratively indicated within the Design and Access Statement planting strategy should be extended across the northern beds of the public realm area. Final planting details will need to ensure predominately evergreen plants that would tolerate significant shade are utilised in such areas.

Informative: The creation and enhancement of habitats should be in accordance with the Biodiversity Gain Plan to be approved pursuant to this planning permission.

- 18. Landscape and Ecological Management Plan (LEMP)** - No development above foundation level shall take place until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority.

The LEMP should include the following:

- (a) Purpose and conservation objectives for the proposed ecological design works.
- (b) Detailed design(s) to achieve stated objectives.
- (c) Extent and location/area of proposed works on appropriate scale maps and plans, including the biodiverse brown roofs.
- (d) Type and source of materials to be used where appropriate, e.g. native species of local provenance.
- (e) Persons responsible for implementing the works, including biodiverse brown roofs.
- (f) Details of initial aftercare.
- (g) Aims and objectives of management.
- (h) Prescriptions for management actions.
- (i) Preparation of a work schedule.
- (j) Habitat monitoring provisions.
- (k) Details of the individual, body or organisation(s) responsible for implementation of the agreed measures within the plan.
- (l) Arrangements for management and maintenance of the biodiverse brown roofs across the lifetime of the development, including responsibilities and replacement strategy.

The development shall thereafter be implemented in accordance with the approved LEMP and all approved features shall be retained in that manner thereafter.

Reason: To ensure suitable delivery and management of ecological and biodiversity mitigation and enhancement in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy and paragraphs 187 and 193 of the NPPF.

Informative : The LEMP should include management of on-site habitats to achieve biodiversity net gain in accordance with the Biodiversity Gain Plan to be approved pursuant to this planning permission.

19. **Boundary Treatments** - Notwithstanding the submitted Landscape Proposals Boundaries & Edges drawing (13281-LUC-AC-XX-DR-L-0004 rev P05) and approved drawings, no development above foundation level shall take place until a plan indicating the positions, design, materials and type of boundary treatment to be erected, including Secured by Design considerations and any access points and access control measures, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied/used until the approved boundary treatments have been erected in accordance with the approved details. The development shall thereafter be retained as such.

Reason: To ensure satisfactory boundary treatments locations and form would meet safety and security expectations and provide interests of visual amenity within the area in accordance with adopted Gravesham Local Plan Core Strategy Policy CS19.

Informative – ‘Landscape Proposals Boundaries & Edges’ drawing 13281-LUC-AC-XX-DR-L-0004 rev P05 includes publicly accessible areas between the southern flank of the proposed apartment blocks 3 and 3 and adjacent houses, which are not publicly surveilled and would provide opportunity for anti-social behaviour. These areas are proposed to be enclosed on the street end with 1.8m high black steel railing but the expectation for the enclosure of amenity spaces to the street would be by brick wall.

20. **Biodiverse Brown Roofs** - No development above foundation level shall take place until full details of the biodiverse brown roofs shown indicatively on the approved drawing ABC-BPTW-S01-04-DR-A-0144 Rev C05 (Proposed Site Layout –Roof) for the 3no. apartment blocks have been submitted to and approved in writing by the Local Planning Authority. Details for each 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;
- (d) The biodiverse brown roofs shall be installed in accordance with the approved details prior to the first use of the building to which they relate and shall thereafter be maintained in accordance with the approved LEMP 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.

Informative: Arrangements for management and maintenance across the lifetime of the development, including responsibilities and replacement strategy for the Biodiverse Brown Roofs is a requirement under condition 18.

21. **Photovoltaic Panels** - No development above ground level shall take place until details of photovoltaic panels (PV), indicatively shown on drawing ABC/BPTW-S01-04-DR-A-0144 rev C05 (Proposed Site Layout – Roof), have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate how they will achieve the supply of the electricity needs for the landlord only owned areas of

the building to which they relate. Details shall include the location, appearance, form and technical specification of the photovoltaic panels, and how they would be integrated into roofs of the buildings. The photovoltaic panels shall be installed in accordance with the approved details prior to first occupation of the building to which they relate and 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.

22. **Street Furniture (Light Columns)** - Notwithstanding the details within the 'Lighting Assessment' (Stantec, ref. 332612492 rev V3, dated February 2026) no development shall commence above ground works until details of the appearance and form of street lighting equipment have been submitted to and approved in writing by the Local Planning Authority. 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.

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.

23. **Electric Vehicle (EV) Charging** - No development above foundation level shall take place until details of a minimum of 33no. active electric vehicle charging points (comprising SMART sockets connected to the electrical supply system that vehicle owners can plug their vehicle into, with a minimum output rating of 7kW- Mode 3, AC) have been submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location and the design of the supporting apparatus and arrangements for management and maintenance of the electric vehicle charging points that are located within communal car parking areas and privately maintained highways/verges. The approved active electric vehicle charging points shall thereafter be installed prior to first occupation of the dwelling to which they relate (in the case of EV serving allocated parking spaces) or the first occupation of any dwellings within the relevant street (in the case of EV serving visitor parking spaces). The electric charging points shall thereafter be retained and maintained in a good working order at all times.

Reason: In order to encourage sustainable travel, carbon reduction and protect amenity, in accordance with Gravesham Local Plan Core Strategy Policies CS11, CS18 and CS19.

Informative : Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list:

<https://www.gov.uk/government/publications/electric-vehicle-homecharge-schemeapproved-chargepoint-model-list>

24. **Public Art** - No development above foundation level shall take place until full details of public art to be embedded/installed within the development hereby approved have been submitted to and approved in writing by the Local Planning Authority. The removal of the TS Sturge plaque from this site and its relocation within the site shall form part of the public art details. The submitted details shall be formulated following the procurement of a public arts consultant to lead the commissioning of the work and shall include details

of location, design, appearance, lighting and any other features as appropriate, ongoing maintenance strategy and a timetable for installation. The approved public art shall thereafter be installed in accordance with the approved details and timescale and shall thereafter be maintained in accordance with the approved maintenance strategy at all times.

Reason: To ensure that the development creates a high-quality environment through design and layout of open spaces and public realm in accordance with the principles of Kent Design and Policy CS19 of the Gravesham Local Plan Core Strategy.

Informative: The TS Sturge plaque that is to be removed from its current location within the site should be relocated within the site, as part of the agreement of public art details within the public realm. The plaque should be referenced within the series of heritage interpretation boards to be agreed from the wider Harbour Village development, to which this development would operate as an extension.

Prior to Occupation/Use

25. Access Arrangements – No part of the development hereby approved shall be occupied until details of the access arrangements from the public highway to the western part of the site, including provision for vehicles, pedestrians and cyclists, have been submitted to and approved in writing by the Local Planning Authority. The approved access arrangements shall be implemented in full accordance with the approved details prior to the first occupation of the development and thereafter retained.

Reason: In the interests of suitable access being provided to the site for the development in accordance with the Local Plan First Review Saved Policy T5.

Informative: It is expected that the access arrangements should be based on the access arrangements from Harbour Village Phase 3B submission from Harbour Village Phase 2 to the application site.

26. Completion of Fastrack - No part of the development hereby approved shall be occupied until the section of Fastrack bus road as identified as 'Proposed Highways for Adoption' on drawing 1803/05/1105 rev B (Bus Road West Adoption Plan), located within the application site, has been constructed in full accordance with the approved plans and made available for public use.

Reason: To ensure the timely provision of the strategic public infrastructure, free-flow of traffic, access to the provision of the service and pedestrian safety in accordance with Gravesham Core Strategy Policies CS11, Ebbsfleet Sustainable Travel Strategy and paragraphs 115 and 116 of the National Planning Policy Framework.

27. Vehicle Vision Splays - No part of the development hereby approved shall be occupied until the vehicle visibility splays shown on drawings 013 Rev 005 (2.4 x 43m Visibility Splays) and 009 Rev 006 (Fastrack Visibility) have been provided. The splays shall be kept clear of obstructions over 0.6 metres above carriageway level within the splays and thereafter maintained as such at all times.

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

28. **Pedestrian Vision Splays** - No part of the development hereby approved shall be occupied until the pedestrian visibility splays shown on drawing 008 Revision 005 (2m x 2m Pedestrian Inter-Visibility) and 009 Rev 006 (Fastrack Visibility) shown have been provided. The splays shall be kept clear of obstructions over 0.6 metres above carriageway level within the splays and thereafter maintained as such at all times.

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

29. **Provision and Retention of Parking** - With the exception of the visitor parking spaces within College Road (public highway), no part of the development hereby approved shall be occupied until the residential and visitor vehicle parking spaces relating to that dwelling, as shown on the drawing ABC-BPTW-S01-XX-DR-A-0150 rev C04 (Parking Strategy), have been provided and are available for use, including final surfacing, drainage and demarcation. The visitor parking spaces shall be clearly demarcated as such and shall remain unallocated at all times. Thereafter, no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order amending, revoking or re-enacting that Order) shall be carried out on the area of land reserved for vehicle parking or in such a position as to preclude its use for vehicle parking.

Reason: To ensure the timely provision of the associated parking in accordance with Gravesham Saved Local Plan Policy T5 and paragraphs 115 and 116 of the National Planning Policy Framework.

30. **Cycle Parking** - No dwelling hereby approved shall be occupied until the secure and sheltered cycle parking relating to that dwelling, as shown on the drawing ABC-BPTW-S01-00-DR-A-0151 Revision C04 (Cycle Strategy), including adaptive and visitor cycle parking, has been provided and is available for use. The cycle parking shall thereafter be retained and kept available for use at all times.

Reason: In order to encourage sustainable travel in accordance with Policies CS11 and CS19 of the Saved Local Plan First Review 2014.

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

32. **Parking Management Plan** - Notwithstanding the Framework Site Wide Parking Strategy (Technical Note, Stantec, 332410098/400.100, TN001 Rev E, 27 February 2026), no part of the development hereby approved shall be occupied until a detailed

Parking Management Plan (PMP) for the site has been submitted to and approved in writing by the Local Planning Authority. The PMP shall include, but not be limited to, details of:

- a) Allocation of parking:
 - permit parking zones
 - how the allocation of parking permits within the site will operate (initial and ongoing)
- b) How all parking spaces will be managed including:
 - information related to any Traffic Regulation Orders
 - private parking management and enforcement
 - permit systems
 - visitor parking time limits
 - enforcement operation to prevent on street parking outside of designated bays and permitted duration within visitor bays
 - hours of parking enforcement operation
 - a programme of implementation, monitoring and management of the car parking to be reviewed regularly and as necessary for the lifetime of the development
 - arrangements should the management company go into administration
- c) 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)
- d) Details of arrangements for the management and maintenance of electric vehicle charging points.
- e) Details of how future purchasers will be made aware of the parking management regime on the site, the allocation of parking spaces, the availability of the car club within the adjacent Harbour Village development and the potential introduction of a Controlled Parking Zone within surrounding public highway (which will not issue parking permits to Abacus Corner 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 PMP and the approved parking controls and enforcement shall be operational from occupation of the development 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.

Informative : The submitted Framework Site Wide Parking Strategy refers to visitor parking within private streets being allowed for up to 6 hours before a permit is required. This time period is considered too extensive and it would be expected that only a period of a maximum of 4 hours be reflected within further submissions to fulfil this planning condition.

33. **Residential Travel Plan** - Notwithstanding the 'Residential Travel Plan' (Stantec, 332612492, February 2026), no part of the development hereby approved shall be occupied until a Full Travel Plan (FTP), to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The FTP shall include:

- access to the car club at Harbour Village
- one year's free membership to the car club per household for the first occupation of a dwelling (on request)

- objectives and modal-split targets
- a programme of implementation and provision for monitoring, review and improvement

Thereafter, the FTP shall be implemented and adhered to throughout the life of the development, with monitoring taking place for a minimum of five years from the date of first occupation.

Reason: To account the particulars of the proposal including car-free units and an enhanced package of sustainable travel measures in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy and the Ebbsfleet Sustainable Travel Strategy.

34. **Noise Mitigation** - No dwelling hereby approved shall be occupied until the acoustic mitigation measures related to that building, as detailed within the 'Sensitivity of Receptor and Acoustic Mitigation' section (page 28) of the 'Noise Impact Assessment' Rev 04 (Stantec, Project 332612492. Report date September 2025, rev 04 date 25/02/26), 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.

35. **Surface Water Drainage Verification** – No dwelling hereby approved shall be occupied until a Verification Report, pertaining to the approved surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The report shall demonstrate that the drainage system constructed is consistent with the details to be approved pursuant to condition 4. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed. The development shall only operate in accordance with the agreed operation and maintenance manual.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained in accordance with Policies CS18 and CS19 of Gravesham Local Plan Core Strategy and pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

36. **Contamination Verification** - No dwelling hereby approved shall be occupied until a Verification Report demonstrating completion of the works set out in the approved contamination remediation strategy to be approved pursuant to condition 5, and the effectiveness of the remediation, has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, including timescales, as identified in the verification plan, and for the reporting of this to the Local Planning

Authority. The long-term monitoring and maintenance plan shall be implemented as approved and in accordance with the agreed timescales and contingency plan.

Reasons: To ensure development addresses issues related to historic contamination and mitigate potential risks to controlled waters, including the nearby creek and groundwater in the underlying principal aquifer and the health of future and neighbouring occupiers, in accordance with Policy CS19 of Gravesham Local Plan Core Strategy and paragraph 196 of the National Planning Policy Framework.

Compliance

37. **Flood Risk Mitigation** - The development shall be carried out in accordance with the submitted 'Flood Risk Assessment' (RLT Engineering Consultants Ltd, ref. 240104 Rev B, dated 24 February 2026) and the Levels Strategy drawing 2401/04/7000 in Section 14.0 'Conclusions'. These mitigation measures shall be fully implemented prior to first occupation of each relevant dwelling hereby approved to which those measures relate. The mitigation measures shall thereafter be retained and maintained at all times.

Reason: To minimise the risk of flooding in line with paragraphs 158, 165 and 173 of the National Planning Policy Framework (NPPF) and Policy CS18 of the Gravesham Local Plan Core Strategy.

38. **M4(2) Compliant Dwellings** - The dwellings identified as M4(2) accessible and adaptable dwellings on drawing ABC-BPTW-S01-XX-DR-A-0153 rev C01 (Proposed Site Layout – Dwelling Accessibility) 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 Policy CS19 of the Gravesham Local Plan Core Strategy.

39. **Piling** - Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. As applicable, the development shall be carried out in accordance with the approved details.

Reason: To ensure piling works taking place in made ground or contaminated areas do not present a risk to groundwater within the underlying principal aquifer or to the nearby creek and future and neighbouring occupiers in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and paragraph 196 of the National Planning Policy Framework.

40. **External Lighting within the Site** - External lighting shall be installed in accordance with the 'Proposed Street Lighting Layout' shown within the Lighting Impact Assessment Report (Stantec, ref. 332612492 rev V3, dated February 2026) prior to the street or space within which it is located first coming into use. The external lighting shall thereafter be maintained and retained in working order at all times.

Reason: To ensure the proposal minimises light spill and to protect adjacent habitats and wildlife from impacts from lighting in accordance with adopted Gravesham Local Plan Core Strategy Policies CS12 and CS19.

41. **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, February 2026), 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.

42. **Circular Economy** - The development hereby permitted shall be carried out in accordance with the commitments, targets, monitoring, reporting, and implementation plan set out in the Circular Economy Statement (Hydrock Consultants Ltd, ref 38951-HYD-XX-XX-RP-Y-5001 Issue 3, dated 25 February 2026).

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.

43. **Unexpected Contamination** - If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 196 of the National Planning Policy Framework.

44. **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

45. **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 planning application:

- 13281-LUC-AC-XX-DR-L-0004 rev P05 – Landscape Proposals Boundaries & Edges
- Bus Road West Adoption Plan – 1803/05/1105 Rev B
- Statement of Application Updates - February 2026 (Savills)
- Infrastructure Assessment (Stantec, February 2026)
- Existing Site Plan - ABC-BPTW-S01-XX-DR-A-0102 rev C02
- Residential Travel Plan (Stantec, ref 332612492.100.1 rev C, dated 26 February 2026)
- Transport Statement (Stantec, dated 27 February 2026)
- Fastrack Visibility (009 rev 006) (Additional to TA)
- Bus Tracking (017 rev 002) (Additional to TA)
- Framework Site Wide Car Parking Management Plan, Technical Note –400.100/TN0001 rev E (Stantec, 27 February 2026)
- Community Involvement Strategy (February 2026)
- Urban Greening Factor (LUC, 13281-LUC-AC-XX-DR-L-0005 rev P03)
- Planning and Affordable Housing Statement (July 2025)
- Accommodation Schedule (ABC-BPTW-XX-XX-SA-A-0108 rev C04, dated 20.02.2026)
- Utilities Assessment rev B (Stantec, ref 332612492/100.6 dated February 2026)
- Part O, Overheating Assessment (Stantec, ref 332612492, dated July 2025)
- Noise Impact Assessment v 04 (Stantec, ref 332612492, dated September 2025)
- Lighting Assessment (Stantec, ref 332612492 V3, February 2026)
- Energy & Sustainability Statement v2 (Stantec, February 2026)
- Ecology Technical Note (AAE Environmental, ref 243295 Rev A, dated February 2026)
- Daylight & Sunlight Report – Ref.6963 (EB7, 27 February 2026)
- Geoenvironmental Assessment Report – Ref.GEA-21912Y-21-184 (Idom, May 2021)
- Circular Economy Statement – Ref.38951-HYD-XX-XX-RP0Y-5001 issue 2 (Hydrock Consultants Limited, 25 February 2026)
- Statutory Biodiversity Metric rev B (25 February 2026)
- BNG Technical Response Note (AAE Environmental Consultants, ref. 2433295 rev B, dated February 2026)
- Air Quality Assessment (Final) (Stantec, February 2026)
- Surface Water Maintenance and Management Strategy Rev A (RLT, dated 22.09.2025)
- Flood Risk Assessment – Ref.240104 Rev B (RLT, dated 24.02.2026)
- Drainage Strategy drawing (2401/04/3000 Rev E)
- Catchment Areas (2401/04/3001 Rev B)
- Drainage Simulation Results (Site3D, Design-XX-ABACUS CORNER.dwg, 1 April 2026)
- Design and Access Statement C01 (BPTW, February 2026)
- DAS – updated Landscape planting page (April 2026)
- Financial Viability Assessment Review (Cushman & Wakefield, October 2025)
- Financial Viability Statement (James.R.Brown, February 2026)
- Stantec – Technical Note - Response to KCC comments (dated 19 September 2025)
- Stantec – Technical Note – Response to EDC Lighting consultant (23 October 2025)
- 017 Rev 002 – Abacus Corner – Bus Tracking
- Doc 001 – Draft Heads of Terms table

- S106 Land Ownership Plan ABC-BPTW-S01-XX-DR-A-0104 Rev C02

2. 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.

3. 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.

4. BIODIVERSITY NET GAIN

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:

- a) a Biodiversity Gain Plan has been submitted to the Local Planning Authority, and
- b) the Local Planning Authority has approved the plan.

The Local Planning Authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be the Ebbsfleet Development Corporation.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. However, based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Please note the KCC Ecology comments dated 13 April 2026 highlighting the following points that must be addressed within the submitted biodiversity gain plan following planning permission being granted: The Biodiversity Gain Plan must be prepared in accordance with the baseline and ecological information submitted and approved with this planning application. In this respect the 'Technical Note: Biodiversity Net Gain Rev B' (AA Environmental Ltd, ref. 243295, dated February 2026), will require update following final minor amendments to the approved landscaping scheme.

5. SOUTHERN WATER

In order to protect water apparatus, Southern Water reminds the applicant that the developer must agree with Southern Water, prior to commencement of the development, the measures to be undertaken to protect/divert the public water supply main.

6. 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.

7. ENVIRONMENT AGENCY

Flood Risk Activity Permit - The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

8. PORT OF LONDON AUTHORITY

Prospective future occupiers should be made aware of nearby 24 hour Safeguarded Wharf/Industrial operations. To address this noise environment potential future occupiers should be made aware that mechanical ventilation has been provided as an alternative to opening a window to prevent overheating.

9. 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.

10. 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>. 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>

11. KENT FIRE AND RESCUE SERVICE

Applicants should be aware that in the event of planning permission being granted the Fire and Rescue Service would require emergency access, as required under the Building Regulations 2010, to be established. Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

12. 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. In this case:

- 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; and
- The application was determined within the relevant timescales agreed through an extension of time.

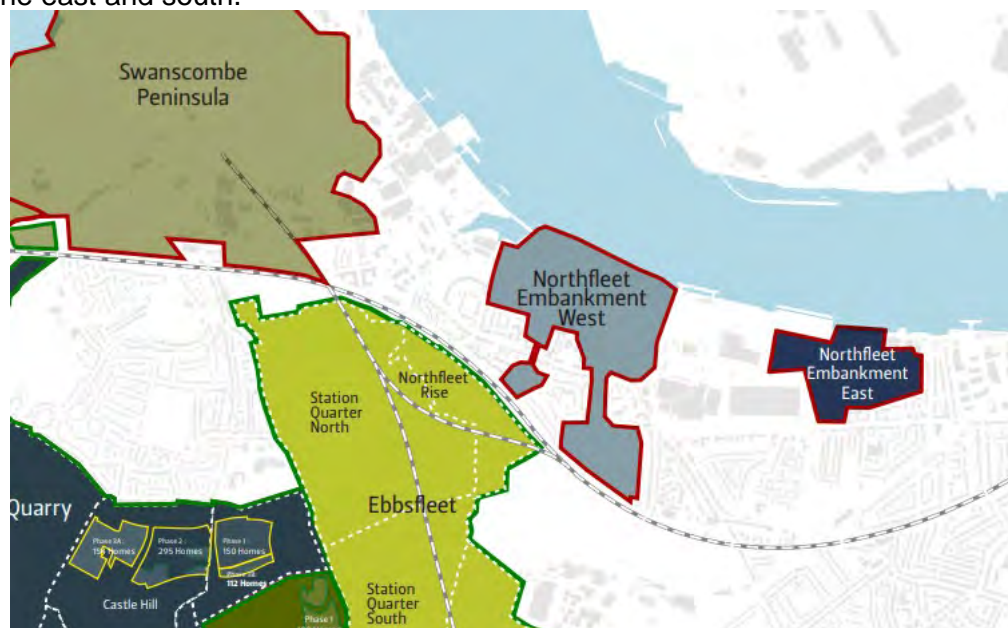
13. REASON FOR IMPOSITION OF PRE-COMMENCEMENT CONDITION

Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the Local Planning Authority is satisfied that the requirements of planning conditions 3, 4, 5, 6, 7, 8 and 9 (including the timing of compliance) is so fundamental to the development permitted that such details must be submitted prior to works commencing on site. In accordance with The Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the imposition of these pre-commencement conditions has been agreed in writing with the applicant.

1.0 SITE CONTEXT AND PROPOSAL

Background and Site Context

- 1.1 The application relates to land located within the Northfleet Riverside strategic development area, as identified in the EDC Implementation Framework. The application site falls within the sub-area known as Northfleet Embankment West.
- 1.2 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.

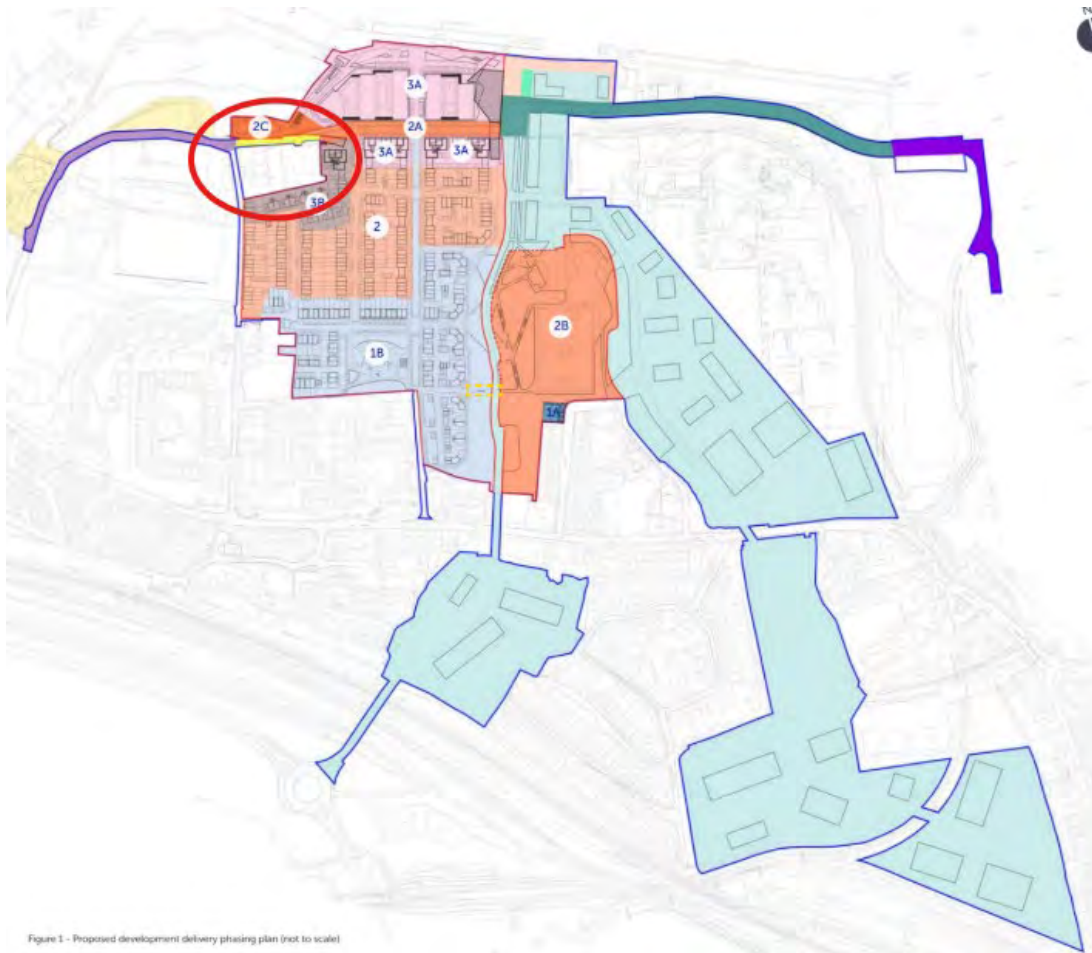


(Source: EDC Implementation Framework)

- 1.3 Within the wider Northfleet Riverside area heavy industry and employment operations take place including manufacturing at the WE Roberts Ltd operation directly to the west of the site. Robins Wharf lies to the west adjacent to where the River Ebbsfleet enters the River Thames via Robin's Creek and is safeguarded by the Kent Minerals and Waste Local Plan for its minerals function. The redundant Bevans Wharf, adjacent to the phase 3A of Harbour Village, is no longer operational and is not safeguarded.
- 1.4 The wider settlement of Northfleet is located to the southeast of Northfleet Embankment West, 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 trainline 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.
- 1.5 The Northfleet Riverside area also comprises part of the North Kent Innovation Zone which is designated as an Enterprise Zone.
- 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 A single Outline Planning Permission (OPP) has been granted within the Northfleet Embankment West area under reference EDC/16/0004, but that permission excluded the Abacus Corner employment area, which makes up a significant proportion of the current planning application site being referred to as 'Abacus Corner'. The plan below of the EDC/16/0004 OPP site demonstrates this relationship. The Abacus Corner existing employment site is circled and remains uncoloured:



(Source: OPP masterplan)

Application Site

- 1.8 The application site comprises an area of approximately 0.58 hectares. It is located within the northern part of EDC's Northfleet Embankment West development area, as identified within the Implementation Framework. The application site comprises the Abacus Corner employment site together with land that falls within the EDC/16/0004 OPP site along the northern eastern and southern boundaries of Abacus Corner employment site, as well as highway land within College Road to the west. For clarity, the plan below shows the extent of the Abacus Corner existing employment site (unhighlighted) as part of the whole application site for this current application.



(Source : Existing Site Plan with officer highlights)

- 1.9 To the northeast of the site is approved residential development within Harbour Village Phase 3A and to the north is the approved Robins Creek Sustainable drainage systems (SuDS) park. To the south and east of the site is the vacant Harbour Village Phase 3B residential land, which is being considered concurrently with this application (EDC/23/0078 - under consideration). To the west of the site is College Road and WE Roberts Ltd manufacturing site on the opposite side of College Road.
- 1.10 Vehicular, cycle and pedestrian access to the application site is through the Harbour Village proposed Phase 3B site, which itself acquires access through Phases 2 and 1B via an extension of Hive Lane from Northfleet High Street. Pedestrian/cycle shared links from College Road have also been established giving access to/from Harbour Village. Access to the application site can also be gained by pedestrians and cyclists only from the proposed Fastrack route through the public realm area. There is no access through the site onto the Fastrack road by motorised vehicles.
- 1.11 The application site's boundary overlaps the adjoining OPP, overlaying a length of the OPP (EDC/16/0004) Fastrack route, and a number of approved or proposed developments on various boundaries. On its southern and eastern sides the site boundary overlaps the proposed Harbour Village Phase 3B RM site. On its western side the site overlaps the approved Grove Road Highway Improvement development (EDC/23/0043). On its northern side the site overlaps the approved Harbour Village Phase 2C – SuDS park (EDC/21/0206). The site also includes significant sections of the public highway in College Road.
- 1.12 In respect to the overlap of the site with the proposed Harbour Village Phase 3B RM application (currently also being considered) the applicant explains that this is to follow residential plot boundaries within Harbour Village Phase 3B to assist in conveyancing. Within the proposed Phase 3B RM application 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 Harbour Village Phase 3B RM proposed layout

is shown below for clarity with the (blue highlight) blued-out areas being the overlap areas within this Abacus Corner proposal:



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

- 1.13 The overlap of the site with the approved Grove Road Highway Improvement development (EDC/23/0043) is shown below. It involves overlap at the junction of Fastrack with College Road, and would seemingly allow for either development to be built out first with full access to College Road. There is no conflict of development seen between the approved and proposed details of the two developments.



(Source: Grove Road approved red boundary extract drawing and Abacus Corner proposal showing boundary extract.)

- 1.14 In respect to the overlap of the site with the Phase 2C – SuDS park (EDC/21/0206) approved development, at the northern boundary of this application site, the areas of overlap are only very small. Within these small overlap areas the developments are not consistent but the unmatched development is principally soft landscaping being replaced with footway and this is not considered to be ‘material’ by the LPA in the

context of the scheme as a whole. As such the Pilkington principle - that a planning permission will no longer authorise development if and when it becomes physically impossible to carry out the development for which permission was granted through the alteration of the land (without a further permission) – does not nullify the SuDS park permission.

- 1.15 Locationally, the site lies partly within Flood Zones 2 and 3 and partly within Flood Zone 1, as identified by the Environment Agency’s Flood Risk map. The site also falls within Groundwater Source Protection Zone 2 (Outer Protection Zone). The Ebbsfleet Implementation Framework identifies the site as having archaeological potential, and to date the archaeological heritage assets found within Harbour Village site have been extensive.
- 1.16 At the time of writing the Abacus Corner ‘existing employment site’ part of the whole site remains partially operational only. Part of the employment site is occupied by Bellway to provide parking to the support their construction endeavours at Harbour Village, and there is a private owner/operator in a unit fronting on to College Road.
- 1.17 Unlike the OPP Harbour Village site to the south, no land raising has taken place to date within the application site, other than in the overlap areas with the EDC/16/0004 outline permission site. The Harbour Village OPP site was granted planning permission for a development platform, under reference EDC/20/0147, which has been completed.

Proposal

- 1.18 This application seeks full planning approval for the demolition of the buildings within the Abacus Corner employment site and the construction of 68no. residential units, in the form of 3no. blocks of apartments (66no. apartments), and 2no. three-bedroom houses, a section of Fastrack bus route and associated parking, access, private amenity areas, public realm, hard and soft landscaping, biodiversity enhancements and associated infrastructure.
- 1.19 The proposals would provide the following accommodation:

Dwelling Type	1 bed 2 person	2 bed 3 person	2 bed 4 person	3 bed 6 person	TOTAL
Apartment Private Market	21	9	16	0	46
Apartment DMS*	8	2	10	0	20
House Private Market	0	0	0	2	2
TOTAL	29	11	26	2	68

*Discount Market Sales

- 1.20 This development is proposed as an extension to the Harbour Village residential development, integrating with the adjoining Harbour Village Phase 3B RM application (EDC/23/0078) which is being considered concurrently. This application is also interdependent with application Harbour Village Phase 3B in relation to: the two site boundaries materially overlap; access for vehicles, pedestrians and cyclists from Phase 2 to the western part of this site travel through the Phase 3B site using infrastructure only within that 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 this application, intrinsically relate to the development layout (parking spaces for the house fronting College Road) proposed under Phase 3B; KCC Highways advise both

developments would depend on the visitor parking spaces being provided within College Road proposed under this application; and car parking allocation and adapted cycle spaces are provided for these developments cross boundary.

- 1.21 This application is accompanied by a Financial Viability Assessment.

Planning Background

- 1.22 The OPP (EDC/16/0004) was granted in June 2018 for land adjoining the application site, with all matters reserved, for a mixed-use development comprising up to 532 dwellings, up to 46,000sqm of employment floorspace, a neighbourhood centre with retail units, a community centre and riverside pubs and restaurants. The permission was accompanied by a s.106 Agreement. Since the grant of permission, the land has been sold and is now in dual ownership, with Bellway Homes acquiring the residential land in early 2020 and the remaining employment land owned by Northfleet Property LLP, subsequently acquired by NWM Investments.
- 1.23 Reserved matters approvals for several residential parcels, and standalone infrastructure, including Bevans Park, the SuDS park and sections of the Fastrack bus corridor have subsequently been approved. A community centre and riverside park were also approved as part of Harbour Village Phase 3A (EDC/23/0086), to the north-west of the current application site, in 2023. A Reserved Matters application for Harbour Village Phase 3B was submitted at the same time but was subsequently held in abeyance by mutual agreement. A revised Phase 3B submission has now been received and is being progressed in parallel with the current Abacus Corner full application.
- 1.24 The Abacus Corner proposal would effectively extend the Harbour Village residential development and includes delivery of a section of the Fastrack bus corridor, originally required as part of the 2018 OPP. As the OPP has now lapsed in respect of the submission of Reserved Matters applications, the Fastrack provision proposed within this application effectively replaces the undelivered OPP infrastructure. Delivery of this section is critical, as the timing and implementation of the Fastrack corridor was secured through condition and the Section 106 Agreement and is linked to the occupation of the Harbour Village development.
- 1.25 The deadline for submission of Reserved Matters applications pursuant to the OPP has now passed. No Reserved Matters application was submitted for the Abacus Corner Fastrack highway works or for the riverside phase of the Northfleet Embankment West site to the east of Phase 3A, which was identified in the masterplan as a mixed-use retail, office and food and drink hub arranged around a public plaza. The outline permission for these elements has therefore expired.



(Source : EDC/16/0004 – Land Use Parameter Plan)

- 1.26 At the time of writing, the applicant has advised that 210no. dwellings within the Harbour Village development are completed and occupied.

2.0 RELEVANT PLANNING HISTORY

Wider Northfleet Embankment West Site – OPP

- 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.

Phasing and Implementation Plan

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

Residential Masterplan

- 2.3 EDC/20/0080 - Application for the partial **discharge of condition 8** attached to OPP 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

- 2.4 EDC/21/0206 - Reserved matters pursuant to condition 2 of OPP 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 by EDC on 21st December 2022.
- 2.5 EDC/21/0222 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of OPP reference no. EDC/16/0004 for land north and west of Factory Road (Phase 2B) to create a **heritage park** and playing pitch including a pedestrian/cycle bridge and public realm. Approved on 21st December 2022.
- 2.6 EDC/22/0058 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of OPP 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.
- 2.7 EDC/23/0086 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of OPP 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
- 2.8 EDC/23/0078 - Reserved matters application (access, layout, scale, appearance and landscaping) pursuant to condition 2 of OPP 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) - Under consideration

Fastrack route

- 2.9 EDC/23/0100 - Reserved Matters Application pursuant to Condition 2 of OPP reference EDC/16/0004 for the creation of **Fastrack Bus Road West Route (Phase 2A)** - Approved on 27th September 2024.
- 2.10 EDC/24/0043 - Highways improvement works comprising road widening and road realignment of **Grove Road** including demolition of redundant building to accommodate the Fastrack route. Approved 9th October 2025

Wider Northfleet Embankment West Site – Development Platform

- 2.11 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 Related Applications (Joint application with GBC)

- 2.12 EDC/25/0081 - Full planning application for the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping. - Under consideration - (Full application affecting **Phase 1A land**)

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 and Brett Industries, NWM Properties and Tarmac.
- 3.3 The proposals were also advertised on site via 3no. notices and publication in a local newspaper due to comprising major development.
- 3.4 Site Notice expiry date: 31 March 2026
- 3.5 Press Notice expiry date: 02 April 2026
- 3.6 1no. written representation has been received from a member of the public in objection to the application raising the following:
- Overdevelopment
 - Unremarkable housing
 - Will inhibit future marine development opportunities
- 3.7 Furthermore, 2no. representations were received from First Plan on behalf of Aggregate Industries UK Ltd and Brett Aggregates Ltd (dated 10 September 2024). These initially raised objections in relation to noise impacts and the 'agent of change' principle. However, following the submission of a revised Noise Impact Assessment, these representations were withdrawn.
- 3.8 *EDC Case Officer Note: In considering this application, due regard has been given to the comments received and they have been intrinsically assessed in the planning appraisal given below.*

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 Environment Agency

Received 5 March 2026: NO OBJECTION SUBJECT TO CONDITIONS

Conditions related to: development according with the FRA and no finished floor levels for dwellings below 8mAOD; surface water drainage; (pre-commencement condition) full contamination conditions; verification report of contamination remediation strategy; foundation design (piling and penetrative methods). They also advise of information wording related to a Flood Risk Activity Permit.

4.3 Natural England

Received 18 March 2026 – NO OBJECTION

The proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

4.4 National Highways

Received 10 March 2026 - NO OBJECTION

Having assessed the application and, given the nature, scale and location of the proposal we are satisfied that the development would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network.

4.5 Southern Water

Received 10 March 2026 - COMMENTS SUPPLIED:

There is currently adequate capacity in the local sewerage network to accommodate a foul flow of 0.59 l/s for this development. In relation to surface water drainage they advise that no surface water flows (existing or proposed) can be accommodated within the existing foul sewerage system unless by exception to be agreed at the time following evidence of justification/LLFA agreement. They also provide standard advice in relation to protection of their assets from development structures and planting and request these offset distances be conditioned.

EDC Officer Comment: This advice has been shared with the applicant. The conditions requested are generic and do not directly respond to the proposal and as such do not meet the tests for planning conditions. The information within the drafted conditions can however be shared as informatives.

4.6 Kent County Council (KCC) Public Rights of Way

Received 16 March 2026 - NO OBJECTIONS

Public Footpaths NU3 and NU6 current cross though the site but are 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 paths are subject to a temporary traffic regulation order whilst construction work takes place.

4.7 Kent County Council (KCC) Minerals and Waste

Received 10 October 2025 and 29 August 2025 – NO OBJECTIONS:

The applicant has considered the potential impact of the existing industrial uses in the area, and significantly the mineral importation and related operations at Robins Wharf (Site G), on potential future occupants of the proposed development. The applicant therefore wishes to incorporate sufficient mitigation into the design to mitigate any adverse impact. Moreover, the noise impact study (undertaken in accordance with BS 4142:2014) indicated that “.....a low likelihood of adverse noise impact on surrounding existing and future Harbor Village residential premises.” Provided the determining authority’s Environmental Health Officer’s view is consistent with this finding and that

the proposed noise mitigation is sufficient to alleviate any unexpected adverse noise impacts, the County Council has no mineral infrastructure safeguarding objection to the proposal. In respect to the Circular Economy the applicant has prepared a Circular Economy Statement (CES) which discusses the need to address waste reduction via the following circular economy principles: Re-use what's already there; Prioritise off-site manufacture; Circular sourcing; Responsible sourcing; Long life and loose fit. These principles are also expanded upon to demonstrate the materials that will be retained and or discarded by the development proposed in order to maintain these principles during construction. The CES is supported by the County Council in its scope and stated objectives to reduce waste arisings and reuse materials where possible.

4.8 Port of London Authority (PLA)

Received 16 October 2025 – NO OBJECTION SUBJECT TO:

- it is essential there must be conditions and Section 106 agreement that ensure that prospective future occupiers are made aware of nearby 24 hour Safeguarded Wharf/industrial operations, the likely current and future noise level and the mitigation measures that have been put in place as part of the development, such as the mechanical ventilation provided as an alternative to opening a window.
- In the context of this it must also be made clear that for prospective occupiers / owners within the development 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 located in close proximity to the development and the confirmation that occupiers would not be able to rely on openable windows as a means of preventing overheating in for certain facades as shown on figure 4.3 of the Noise Impact Assessment
- the use of the Tidal Thames through the supply chain as part of the construction stage of the development must be robustly considered and must form a specific requirement as part of any forthcoming condition for a detailed Constructions Logistics Plan.

EDC Officer Comment: The request in relation to condition/S106 re the 24-hour operational wharves does not meet the tests for their use but an informative can be used to highlight this matter. Likewise the request for a 'Constructions Logistics Plan' utilising the Tidal Thames goes beyond what could be secured by a planning condition.

4.9 Kent County Council (KCC) Highways

(Various matters considered through multiple representations. Last representation received 10 April 2025 – NO OBJECTION ONLY IF GRAMPIAN CONDITIONS (and associated obligations) ARE SECURED

- Grampian Condition detailing that commencement of the development may not take place until the Traffic Regulation Order for College Road has been successfully modified in line with the planning application proposals
- Grampian Condition detailing that the College Road Traffic Regulation Order must be implemented prior to first occupation
- Conditions related to securing pedestrian visibility splays, vehicle visibility splays, provision of parking spaces prior to first occupation and retention; minimum 33 active EV charging spaces with minimum output of 7kw; all EV chargers for homeowners be Mode 3 standard and SMART units, enabling wifi connection; provision and retention of cycle parking; submission of Construction Management Plan; measures to prevent discharge of surface water onto the highway; Full Parking Management Plan; Full Travel Plan; details of construction of roads, footways, verges and junctions to be submitted and agreed.

EDC Officer Comment: This representation is considered in detail in the highways section of this report.

4.10 Gravesham Borough Council (GBC) Parking

Received 16 October 2025 - OBSERVATIONS SENT:

- The proposed parking locations on College Road area acceptable
- GBC enforcement officers already patrol this area and will patrol these spaces
- If an issue is identified at a specific location officer will be directed to patrol there as long as resources allow
- The proposed residential parking spaces [in College Road] will be for a 4-hour maximum of with no return within 2 hours. The commercial unit visitor parking would be 20-minute parking restriction
- There is a lack of dedicated parking associated with the new convenience store and a lack of visitor parking generally across the scheme [Harbour Village development] which may lead to indiscriminate parking around the junction by people popping into the shop. This is hard to manage and practical measures need to be incorporated into the scheme to prevent this
- The use of cones at the proposed servicing layby would be the responsibility of the occupier and the use would align with their expected delivery times, However, this would be purely a workaround as it is expected that the loading bay at the front of the commercial premises would suffer from regular customer parking and it would not be feasible/possible for the Gravesham Enforcement Officers to enforce all contraventions
- EV charging provisions by GBC/KCC will not be proposed on College Road [public highway] at this stage
- Any on-road landscaping would need to be agreed with the KCC adoptions team
- S106 obligation costs are requested for: TRO amendment costs - £3,000 and signage and lining costs - £2,000

EDC Officer Comment: These are considered in the highways section of the report and the comments and obligation request has been agreed with the applicant.

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

Received 20 April 2026 - NO OBJECTION SUBJECT TO CONDITION

Agreement of detailed design and verification of the implementation of the proposed surface water is required to be secured by planning conditions.

4.12 Kent Fire and Rescue

Received 6 October 2025 - OBSERVATIONS PROVIDED

Emergency access requirements appear broadly compliant. A Building Regulations consultation is required where access arrangements would be examined under section B5 in greater detail.

4.13 Active Travel England

Received 10 March 2026 - NO COMMENT

4.14 UK Power Networks

Received 28 July 2025 – COMMENTS PROVIDED

They advise that there are LV underground cables on the site running within close proximity to the proposed development and further contact should be made directly with them by the applicant.

4.15 Marine Management Organisation (MMO)

Received 5 March 2026 – COMMENTS PROVIDED

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. Marine plans are a statutory consideration for public authorities with decision making functions.

EDC Officer Comment: This is considered in detail in the appraisal section of the report.

4.16 Gravesham Borough Council (GBC) Housing Strategy Officer

Received 19 March 2026 – Refer to previous responses

Received 16 October 2025 - OBSERVATIONS SENT

In terms of affordable housing provision, the development should deliver 30% affordable housing in line with the adopted policy CS16. In terms of affordable housing tenure, the latest housing data is (as of February 2025):

1-Bed	284	29%
2-Bed	353	36%
3-Bed	237	24%
4Bed+	97	10%
Total	971	

EDC Officer Comment: Following review of the applicant's Financial Viability Assessment the EDC consultant advisor concludes (in part) that 'This FVA highlights the viability constraints affecting the site and that, in viability terms, there is no scope for any AH provision or other S106 contributions from the proposed scheme, on the basis that payments are fixed and non-negotiable.... Given Bellway Homes' intentions to provide AH close to 30% we agree that a DMS tenure for the AH component would maximise the site's viability.'

4.17 Gravesham Borough Council (GBC) Environmental Protection Officer (noise)

Received 16 October 2025 - OBSERVATIONS SENT

The EDC Noise consultant confirms that the existing industrial noise sources have been suitably assessed, so the findings/recommendations of the NIA are accepted and there is no objection on noise grounds. This is agreed. Noise levels on a number of external balconies and shared external spaces may exceed the upper value of 55dBA for external amenity areas. The EDC consultant has advised that the exceedances are not sufficient to refuse the scheme on noise grounds. It's agreed that it's disappointing that more effort has not been made by the applicant to mitigate noise levels for external spaces, it's agreed that there are alternative nearby amenity areas.

EDC Officer Comment: This is considered in detail in the appraisal section of the report.

4.18 Gravesham Borough Council (GBC) Leisure

Received 16 October 2025 - OBSERVATIONS SENT:

Access to high quality open spaces and provision of opportunities for sport and recreation can make an important contribution to the health and well-being of communities... GBC current assessment date shows that there is a particular shortage in the provision of artificial pitches, a shortage of junior/youth grass pitches couples with an ageing leisure centre facility shock. Using the Sport England Sports Facility Calculator (SFC) and working on the assumption that approximately 170 residents may potentially reside within the new development (based in an average of 2.5 residents

per residential dwelling), the SFC gives an indicative S106 contribution figure of £88,682.

EDC Officer Comment: The obligation has been agreed by the applicant.

4.19 LPA Lighting Consultant (Bureau Veritas)

Received 9 October 2025 and 5 November 2025– COMMENTS AND CONDITION

There are identified sensitive receptors (residential and ecological). Overall, the lighting design shows appropriate lighting with levels compliant with relevant British standards. The conclusion from the assessment is that there is the potential for moderate adverse effects on some of the future residents located within the west-facing apartments in Block 1 of the Proposed Development as a result of floodlighting from surrounding premises (namely WE Roberts). As 'moderate adverse' is considered significant a condition is required agree a final scheme of mitigation for habitable rooms served by windows in the western elevation.

EDC Officer Comment: The draft condition has been shared with the applicant following advice that the applicant was not intending to submit further information prior to determination. Subsequently a condition has been recommended.

4.20 LPA Noise Consultant (Bureau Veritas)

Received 20 March 2026 – NO OBJECTION

The consultant advises that whilst it is disappointing that the Applicant has not implemented measures within shared exterior spaces to reduce external noise levels to within BS 8233 limits, the technical note is considered to fulfil the clarification recommendations provided within the previous NIA review. It is therefore considered that the application should not be refused on noise ground and conditions are recommended in relation to: Mechanical Ventilation and Hot Water Pumps; internal Ambient & Maximum Noise Levels; Overheating Assessment.

EDC Officer Comment: This advice has been shared with the applicant who responds that 'whilst the future streetscape outside the Abacus Corner plot includes areas of green infrastructure and seating, these are not designated as areas of shared private external amenity for residents. The nearest shared amenity area is Bevan's Park, where noise levels are predicted to be well within the British Standard BS8233 limits for acceptable noise levels in amenity spaces'.

4.21 LPA Contamination Consultant (Leap)

Received 15 August 2025 – NO OBJECTION SUBJECT TO CONDITIONS

The Phase I and II risk assessment undertaken has identified potential contaminants of concern within the underlying soils, and a potential risk from ground gases. It is recommended that a contaminated land condition (pre-commencement) is applied. Further monitoring for ground gases is recommended, along with submission of an updated risk assessment and remediation strategy.

4.22 LPA Air Quality Consultant (AQC)

Received 6 August 2025 – NO OBJECTION SUBJECT TO CONDITIONS

The submitted assessment is generally clear and appropriate and finds no significant impacts on local air quality from the development and finds that the site is suitable for residential use. Conditions are recommended - the CEMP should cover the demolition and construction traffic impacts; Non-Road Mobile Machinery (NRMM) NRMM must adhere to the Road Vehicles and Non-Road Mobile Machinery (Type-Approval) (Amendment and Transitional Provisions) (EU Exit) Regulations 2022 (Statutory Instrument, 2022); a detailed mitigation plan should be provided setting out the steps

of the damage cost calculation and the costings of the measures to be implemented on site.

EDC Officer Comment: A CEMP condition is recommended, reference to NRMM can be by way of an informative.

4.23 KCC Heritage

Received 3 October 2025 and 25 September 2025 – CONDITIONS REQUIRED

No mention of archaeology was submitted with the application but the adjacent site had significant industrial and early pre-historic archaeological interest. Following a request for further information the applicant supplied an outline about their proposed approach to assessment, evaluation and mitigation with respect to archaeology. Further applicant justification of a low potential of archaeological interest on the site was not accepted by the KCC archaeologist and he therefore recommends the need to use a pre-commencement planning condition for a Written Scheme of Investigation, safeguarding measures, archaeological investigation and recording.

EDC Officer Comment: This would be secured by condition and has been advised to the applicant team.

4.24 KCC Ecology

Received 13 April 2026 – NO OBJECTION SUBJECT TO CONDITIONS

Sufficient ecological and biodiversity net gain information has been provided for determination. Developer contributions will need to be provided to mitigate for recreational pressure within the zone of influence of designated sites of international importance. Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as significant and so does not require securing for 30-years. We are satisfied that no further Bat surveys are required. An updated survey should be conducted if works do not commence within 2 years of the site survey. Some mitigation measures have been provided for external lighting and during the construction phase, which are appropriate given the sensitivity of Robins Creek. The construction lighting measures for bats must be included within the construction environmental management plan (CEMP) or a separate Biodiversity Method Statement (BMS). It is accepted that there is limited opportunity for birds within the red line boundary and therefore only advisory information for vegetation clearance needs to be included within the construction and environmental management plan (CEMP). Conditions are required regarding external lighting I and CEMP). A Landscape and Ecological Management Plan (LEMP) will be required. A planning condition requiring that the Biodiversity Gain Plan shall be prepared in accordance with the baseline information provided in the Technical Note, Biodiversity Net Gain Rev B (dated February 2025 and prepared by AA Environmental Ltd) is recommended. There is a need for the local planning authority to carry out an Appropriate Assessment as part of a Habitats Regulations Assessment (HRA) and we note that Natural England have already been consulted and have no objections.

EDC Officer Comment: These comments have been provided to the applicant. Resurveying for bats will be required if the development does not commence within 2 years. This will be required as part of the NE licence requirements. A planning condition is required for a Landscape and Ecological Management Plan (LEMP), including securing of biodiversity enhancement measures and lighting condition. It is noted that the biodiversity gain condition is a deemed pre commencement condition, once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. This Plan is the mechanism to ensure that the biodiversity gain objective

is met. The standard BNG informative would be included on this decision notice to advise of this.

4.25 Kent Police Designing Out Crime Officer (DOCO)

Received 5 March 2026 – ADVICE SUPPLIED

Recommends 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; Security compartmentation approach to large apartment blocks to reduce opportunities for crime; avoiding blank walls are ground floor level adjacent to public spaces to deter graffiti, loitering and balls games; vehicle mitigation features to pedestrian routes to prevent vehicle access; Lighting of open spaces; minimum 3m width of public footpaths; use of prickly planting to prevent desire line creation or potential offenders hiding.

4.26 The following organisations and local ward councillors were consulted on the application but provided no comments: Kent Wildlife Trust, National Grid Plant Protection, Royal Society for Protection of Birds, Northfleet Harbour Restoration Trust were notified, Cllr Jo Hart, Cllr Peter Scollard and 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 effect of section 38(6) of the Planning and Compulsory Purchase Act 2004 is to require planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.4 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.

5.5 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

5.6 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).

5.7 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).

- 5.8 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

- 5.9 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 proposals are:

- Housing Need
- Principle of Development
- Layout, Scale and Appearance
- Landscaping and Trees
- Access, Highways and Parking
- Affordable Housing and Financial Viability
- Housing Standards and Residential Amenity
- Heritage and Archaeology
- Sustainability
- Flood Risk and Drainage
- Ecology and Biodiversity Net Gain
- Building for a Healthy Life

Housing Need

6.2 The Housing Delivery Test for the Gravesham Local Plan was published in February 2025. The results show that between 2024 to 2029 the Council can only demonstrate a land supply of 3 years.

6.3 Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless:

1. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
2. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

6.4 In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other Heritage assets of archaeological interest referred to in footnote 75); and
- Areas at risk of flooding or coastal change.

- 6.5 In determining applications for planning permission involving housing, the decision maker will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 130(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.
- 6.6 The proposed development would deliver a net increase of 68no. residential dwelling, including 20no. affordable homes, and would therefore make a significant positive contribution towards meeting identified local housing needs. Officers consider that this benefit should be afforded appropriate weight in support of the application. However, this benefit must be balanced against the wider objectives of the Development Plan and the NPPF (2024), which require new development to contribute positively to the overall quality of the area, be visually attractive and responsive to local character, provide safe and suitable access for all users, avoid significant adverse impacts on the transport network and highway safety, and ensure an acceptable level of amenity for future occupiers.

Principle of Development

- 6.7 Policy CS01 of the Gravesham LPCS (2014) requires the Council (in this case EDC as the LPA) to take a positive approach that reflects the presumption in favour of sustainable development set out in the National Planning Policy Framework and Paragraph 115 of the NPPF requires that sustainable transport modes are prioritised.
- 6.8 The site lies within the urban area of Gravesend, where Policy CS02 supports the principle of new residential development. The location is also sustainable being close to existing bus stops, local shops and a primary school.
- 6.9 The site also lies within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, as identified in Policy CS03 of the LPCS, which is described as a key site for riverside regeneration in Gravesham, providing around 980 dwellings and around 133,500sqm gross employment floorspace. Principles for redevelopment of this key strategic area are set out for four identified sub areas. The application site is located mostly within sub area 1.4 (Old Northfleet Residential Extension) with development principles for this sub-area identified as: for residential development of around 530 dwellings, open space, and extension and improvements to The Hive local centre and provision of community facilities. All key sites are required to include provision for buses and sustainable opportunities for travel and for this opportunity area a new east-west Fastrack corridor is proposed, further supporting the location as being sustainable for residential development.
- 6.10 OPP (EDC/16/0004) was granted for the 'Northfleet Embankment West strategic site', excluding the Abacus Corner employment site, subject to a section 106 agreement that includes delivery of the Fastrack corridor through the site. As part of the OPP a mixed employment phase was approved on the riverside, but no RM application was submitted prior to the OPP expiring and that part of the OPP site remains undeveloped.
- 6.11 Commenting on this current application the Gravesham Borough Council (GBC) policy officer advises that the loss of the Abacus Corner employment site has not been justified. They direct attention to the part of LPCS Policy CS07 (Economy Employment and Skills) which resists the loss of B class employment floorspace unless either: an equivalent, or greater, number of new jobs on-site or within the Borough are created;

or, the existing premises are incapable of being made suitable for continued employment use; or, the existing premises have an unacceptable environmental impact on the area which is incapable of being suitably mitigated.

- 6.12 However, the initial part of Policy CS07, not quoted by the GBC officer, is relevant and states:

*“Development resulting in the loss of B class employment floorspace will not be supported **unless otherwise allowed for by policies set out in the Core Strategy...**”*

- 6.13 In this case, whilst the Abacus Corner employment land did not form part of the OPP (Northfleet Embankment West strategic site), the loss of the employment land appears to be allowed by strategic Policy CS03 (Northfleet Embankment and Swanscombe Peninsula East Opportunity Area). In sub-area 1.4 (of Policy CS03) the schematic plan clearly indicates Abacus Corner as existing employment, but within the policy text there is no reference to a need to specifically re-provide the B-Class floorspace. Furthermore, while the Ebbsfleet Implementation Framework seeks the retention of existing employment ‘where possible’, in relation to the ‘Northfleet Riverside’ area (in which the whole of the application site lies) the Framework identifies the area for *‘the creation of new waterside **residential neighbourhoods...carefully integrated with employment spaces with an attractive riverside public realm providing continuous access to the Thames and beyond**’*. With the OPP mixed commercial riverside phase (permission fallen away) this part of the Framework requirement was considered to have been met.

- 6.14 Taking into account the various strands of policy and guidance applicable to the proposed loss of the Abacus Corner existing employment site, and in the absence of requirement for direct re-provision, the proposal is not considered to be at odds with policy or guidance for this area. Accordingly, the loss of the employment land is acceptable in principle.

- 6.15 As already discussed, the OPP s106 agreement includes the delivery of the Fastrack corridor through the strategic site and the approved Phasing and Implementation Plan (PIP) for the OPP secured delivery triggers for the various infrastructure items. However, the OPP expired without an RM application being submitted for the ‘Abacus Corner Highway Improvements’ section of the Fastrack road. This current full planning application would provide the ‘missing’ section of the Fastrack road ‘Abacus Corner Highway Improvements’, albeit in a wider form than the OPP boundary allowed which is positive. Securing this section of Fastrack would contribute towards the delivery of a complete priority bus route in the wider area in accordance with the Gravesham LPCS Policies CS10 (Physical and Social Infrastructure) and CS11 (Transport) which collectively support development that delivers or contributes towards necessary infrastructure improvements arising from growth. LPCS Policy CS10 requires developers to provide or fund new or improved physical and social infrastructure, where needed, subject to viability, and ensures such provision is delivered in a timely manner to support development. Complementing this, Policy CS11 promotes proposals that enhance sustainable transport and public transport provision, with particular support for the expansion of segregated Fastrack bus lanes and the introduction of bus priority measures.

- 6.16 The development would achieve a density of approximately 117 dwellings per hectare (dph), exceeding the minimum density target of 40 dwellings per hectare set by LPCS Policy CS15 for sites within the urban area. This represents an efficient use of land in accordance with Section 11 of the NPPF (2024), which encourages the effective use of previously developed or underutilised land to meet housing needs.

- 6.17 In summary, the proposed development would make efficient use of a sustainably located, previously developed site within the Gravesend urban area. The scheme would contribute to the delivery of much-needed housing in a highly accessible location, and would complete the Fastrack bus route to provide the residents of Harbour Village and surrounding area with a sustainable mode of transport and alternative to private vehicles. The scheme accords with the spatial strategy and objectives of Policies CS01, CS02, CS03, CS10, CS11 and CS15 of the Gravesham LPCS, and the overarching aims of the NPPF (2024) to deliver sustainable patterns of growth. While the proposal would result in the loss of the existing Abacus Corner employment site without direct re-provision, this has been assessed against the relevant development plan and guidance, including Policy CS07, Policy CS03 and the Ebbsfleet Implementation Framework. Having regard to the site's location within the Northfleet Riverside area, the absence of a specific policy requirement for re-provision, and the wider regeneration context, the loss of the employment park is not considered to be contrary to policy and is acceptable in principle.
- 6.18 Accordingly, the principle of residential development on the site is considered acceptable, subject to the detailed assessment of matters including design, highway safety, amenity, environmental performance and other material considerations set out in the remainder of this report.

Layout, Scale and Appearance

- 6.19 Gravesham LPCS Policy CS19 requires that the 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. 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.
- 6.20 The development is proposed as an extension to the Harbour Village residential development approved under OPP application EDC/16/0004 and the numerous phases approved under Reserved Matters. The proposal is being considered in conjunction with Phase 3B RM application EDC/23/0078, upon which it relies and across which the site boundary overlaps.
- 6.21 The scheme layout appropriately extends the existing street network established in the Harbour Village scheme, using perimeter block development to create a highly legible street network, framing the key Fastrack route along the harbour, and supports connectivity and wayfinding across this part of Northfleet. It connects seamlessly to the surrounding phases by continuing the established street network and building lines and supports the movement strategy linking directly to wider infrastructure and residential streets. A landscaped north-south route within the scheme establishes a pedestrian connection to the river walk secured within Harbour Village and parkland to the east. The wider Northfleet Harbour Village area offers cycle and pedestrian connections, which this scheme benefits from. The section of Fastrack proposed integrates well with the approved sections, other than the loss of the combined cycleway/footway on its northern side travelling west, which is addressed by a proposed planning obligation, discussed in the 'Access' section of this report.

- 6.22 Adjacent to proposed residential properties, to the south and east, would be dwellings within the Harbour Village Phase 3B (EDC/23/0078) site, under consideration concurrently, and employment uses to the west. A development platform has been completed for the Harbour Village development and finished land levels through the Harbour Village site would fall gradually as travelling north towards the River Thames. Currently the Abacus Corner employment site remains at its existing ground level which is around 2.5m lower than the Phase 3B application site to the south and east. The Fastrack development proposed within this development must be constructed at a ground level meeting the approved sections of Fastrack to its western and eastern ends. As such, it can be seen that the ground levels steps down significantly through the site from south to north to account for this required change. Although the western apartment block is being proposed as 'four storeys' in height, in fact from the north of the block (from the Fastrack Route, SuDS park etc) the block will appear as a five-storey building in height.
- 6.23 The OPP residential masterplan for Harbour Village identified seven character areas for the residential land. The two houses proposed as part of this application 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. The dwellings proposed within the Abacus Corner proposal would appropriately create a seamless transition between phases of development.
- 6.24 The approved apartments, on the southern side of Fastrack, under Harbour Village Phase 3A demonstrated a design narrative informed by analysis of historic building types and specific buildings found within Gravesham town centre and evoked a 'contemporary Georgian' character, informed by Georgian and Victorian residential building typologies found in Gravesend. They were expressed with a white plinth and contrasting redbrick to upper levels and the design utilised arched windows, feature brickwork window surrounds and feature stone banding. At four storeys high those blocks met the parameters set out in the OPP and residential masterplan. This evolved 'Fastrack typology' of architectural character is seen to extend west from the Phase 3A development to the Fastrack frontage buildings within both the Phase 3B proposal and the eastern part of this Abacus Corner proposal.
- 6.25 The land levels fall in the western part of this current application site, and this has allowed for the increase of the western block to five storeys in height. In the original submission this had allowed for the inclusion of a commercial unit at lower ground floor level of the block on the western side, however, the applicant has removed the commercial unit in the revised submission and the overall height of the building reduced by approximately 0.3m at the lower ground floor level. The applicant also advises that the lower ground floor level will be infilled behind a retaining wall, forming the northern facade of the building at this level. Notwithstanding the reduction in height the roofline of the western building steps in height from the adjacent building to its east, which accentuates the scale and creates a sense of presence onto Robins Creek. The applicant has advised that the cost of the construction frame required for a building with five usable storeys was unviable and would prevent the development coming forward.
- 6.26 The north-facing elevations of the western building (blocks 01 and 02) define the arrival at the site from the Fastrack boulevard and the public amenity space surrounding Northfleet Harbour Village (Phase 3A). The design of this key elevation is a culmination of characteristics from both the Fastrack and riverfront typologies. The roofline steps in height to accentuate the scale and create a sense of presence onto the Creek,

forming a gateway into the wider development area. The arched reconstituted stone detailing and the verticality of the banding visually connects balconies across floors. These architectural features have been applied consistently across the east and west elevations creating a coherence of openings on the ground floor, and ensures a similar level of design articulation across the entire width of the building. The balustrading to the balconies has been strategically arranged to provide privacy between dwellings.



(Source: Proposed Street Elevation)

- 6.27 A small section of new street is incorporated within the scheme, designed as a pedestrianised extension of the existing new street running south-north included in the Harbour Village masterplan and Phase 3B. The street travelling north then changes to a pedestrianised public realm area between the eastern (block 3) and western (block 1 and 3) buildings. The generous public realm area sensitively deals with the change in levels from the ‘houses’ level to the south to the Fastrack level to the north by the creation of a terraced space with the opportunity to become a significant place within the wider neighbourhood with the landscape element including good levels of planting and seating, to allow people to gather and take in the view across the Thames from a protected position.
- 6.28 In summary, subject to appropriately worded planning conditions to secure materials and architectural detailing, the layout aligns well with the EDC Public Realm Strategy, promotes active travel and integrates with surrounding infrastructure and follows good urban design principles to deliver attractive, safe, and efficient layouts that contribute positively toward an appropriate character for the location, as required by the EDC Implementation Framework. The scale, design and layout of the built form is well thought-through and would create a seamless transition between phases of Northfleet West residential development and mark arrival at the Harbour Village development, in combination with the SuDS park in Phase 2C and the riverside landmark building in Phase 3A. The proposal complies with the relevant national and local policies and guidance in relation to scale, layout and appearance.

Ecology and Biodiversity Net Gain

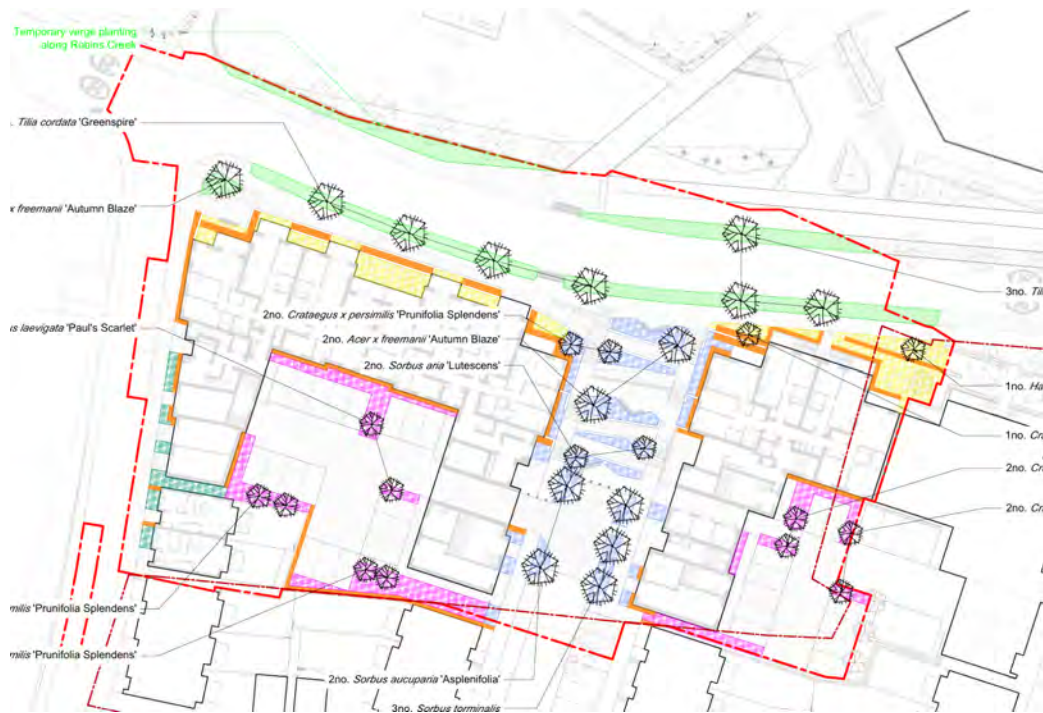
- 6.29 Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) biodiversity should be maintained and enhanced through the planning system. Gravesham LPCS Policy CS12 requires no net loss of biodiversity in the Borough, seeking opportunities to restore, re-create and maintain habitats.
- 6.30 Schedule 7A of the TCPA 1990 (inserted by the Environment Act 2021) refers to the 'Biodiversity Net Gain' requirement for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. The statutory framework for biodiversity net gain has been designed as a post-permission matter to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Once planning permission has been granted, unless exempt, a Biodiversity Gain Plan must be submitted and approved prior to the commencement of that development. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process.
- 6.31 The applicant has submitted a Biodiversity Net Gain Technical Note, Biodiversity Net Gain calculation as well as additional information following review. The BNG calculation is based on the revised submission that predates the belated addition of a new 'Fastrack Frontage' typology in the planting strategy, varying the 'low structural planting' palette to provide suitable variation of the mix appropriate to the areas for its use. No update of the BNG metric has been supplied for the revised planting strategy, however, it is noted that no additional trees are proposed as part of this late planting revision and the last BNG calculation received resulted in very significant BNG increase overall. In that assessment the overall net gain was of 0.43 habitat units, the equivalent increase of 165%, and an overall net gain of 0.31 hedgerow units, the equivalent increase of 2244%. It is accepted therefore that the belatedly revised planting strategy will also significantly exceed the minimum BNG requirement of 10% within the site.
- 6.32 The County Ecologist confirms that the statutory requirement of a minimum 10% Biodiversity Net Gain (BNG) applies to this development and that this will be delivered entirely on site. The proposed post-development habitats include areas of modified grassland, which are considered appropriate and realistic for this urban residential context. A brown roof is proposed in combination with solar panels; however, the BNG assessment excludes any habitat provision beneath the solar panels. Ornamental planting is set out within the Design and Access Statement and is illustrated on the submitted landscape plans and reflected within the biodiversity metric. The proposed tree planting is predominantly native, with limited use of non-native cultivar species that are beneficial for pollinators. Other areas of planting also largely comprise native species suited to supporting pollinators. In response to the Kent County Council Ecologist's request for a planning condition requiring submission of a Biodiversity Gain Plan post-decision, it is noted that this matter will be secured through the deemed pre-commencement condition. This requires that, following the grant of planning permission, a Biodiversity Gain Plan must be submitted to and approved by the Local Planning Authority prior to the commencement of development. This Plan provides the formal mechanism for ensuring delivery of the biodiversity net gain objective. If approved, a standard BNG informative would be included on the decision notice highlighting these requirements and KCC's comments.

- 6.33 The submitted Ecology Technical Note considered that, following preliminary ecological investigation, no surveys for protected or propriety species was required. In part this was based on an updated site visit which reviewed the buildings and trees on site and concluded that there remained negligible potential for roosting bats, and due to the limited vegetation on site that foraging and commuting would also be limited. The County Ecologist is satisfied that no further surveys are required at this time. But they would require an updated survey be conducted if works do not commence within 2 years of the site survey (dated 10 April 2025). This can be secured by planning condition with a copy of the report submitted for agreement to the Local Planning Authority.
- 6.34 In respect to biodiversity enhancement the NPPF refers to providing net benefits (enhancements) for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. Further to the planting already discussed, the submitted Ecology Technical Note refers to opportunities for enhancement by providing roosting, nesting and sheltering opportunities for a range of species and the creation of new wildlife habitats: nest boxes; bat boxes; pollinator nest sites. The County Ecologist advises a planning condition for a site wide Landscape and Ecological Management Plan (LEMP) which links into the BNG proposals and includes the additional enhancement measures listed in the Ecology Note. They recommend that bat and bird boxes are integrated into the buildings, and of the pollinator nest sites some of them can be integrated or included within the proposed brown roofs. The LEMP should be secured by planning condition.
- 6.35 The KCC Ecologist has reviewed the submitted documents and advise that it notes the existing levels of lighting, including from the neighbouring sites, with the lighting requirements for the Fastrack road to the northern boundary. It notes the sensitivity of Robins Creek and the light level is shown to be mostly 1 lux within the Creek and 2.5 lux to the boundary which is acceptable. Some mitigation measures have been provided for external lighting and during the construction phase, which are appropriate. The construction lighting measures for bats must be included within the construction environmental management plan (CEMP). The lighting scheme should be secured by planning condition.
- 6.36 Therefore, subject to suitably worded planning conditions, it is considered that the ecological impacts of the proposed development would be acceptable. Ecological interests would be appropriately safeguarded and enhanced through the imposition of conditions, and the proposal is considered to accord with relevant national and local planning policies and guidance. The development would also meet, and exceed, the statutory requirements for Biodiversity Net Gain as set out under Schedule 7A of the Town and Country Planning Act 1990.

Landscaping

- 6.37 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.
- 6.38 The proposed tree planting strategy is generally informed by the street hierarchy, featuring larger trees acting as markers along the Fastrack boulevard with smaller

flowering trees along the pedestrian route. Together with the updated shrub planting along Fastrack this approach is a continuation of the planting scheme for Fastrack established under the 'Bus Road West' RM application.



(Source: landscape proposals)

- 6.39 The public realm terrace between the apartment blocks has been discussed above and is to the significant benefit of future residents and a green corridor approach. During the course of the application the planting bed in the north west corner of the site has been enlarged, and an additional area of planting has been added adjacent to the cycle stands. These changes are welcomed and now look to maximise the areas of planting, within the constraints of this area. The parking courts also features trees which help to break up the hard surfacing, which is in line with the EDC guidance of a tree for every 4 spaces.
- 6.40 Additionally, the proposal has included further green infrastructure through the provision of brown roofs on the apartment blocks.
- 6.41 Category 12 (Back of pavement to front of house) of the Building for a Healthy Life (BFHL) assessment highlights some areas of the site, between southern flank walls of the apartment blocks and the adjacent houses, that propose the use of tall metal railings to the street, where the use of a wall would be expected, and would create areas of 'no-mans land' that are of concern in relation to safety and security as they lack natural surveillance. At the time of writing a resolution has not been reached with the applicant and as such this matter is the subject of a planning condition to overcome current visual amenity and safety concerns.
- 6.42 Overall, subject to appropriately worded planning conditions to secure the hard landscaping materials details, boundary treatments, soft landscaping final planting details and management, which are also linked to the matters of ecological enhancement and Biodiversity Net Gain, the landscaping of the proposed development is considered to comply with the relevant national and local policies and guidance.

Flood Risk and Drainage

- 6.43 LPCS 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.
- 6.44 The Environment Agency's Flood Map for Planning shows the site to lie partly within Flood Zones 3 and 2, as well as Flood Zone 1, but the site is protected by an existing flood defence in the form of the river wall to the adjacent River Thames. A Flood Risk Assessment (FRA) and 'Drainage Strategy' have been submitted in support of the application together with additional clarifications requested by the LLFA. The site is allocated within the Local Plan as an area for residential redevelopment and as such no sequential test is required for the location of housing at the site.
- 6.45 Southern Water have advised that there is currently adequate capacity in the local sewerage network to accommodate a foul flow of 0.59 l/s for this development. They also provide standard advice in relation to protection of their assets from development structures and planting and request these offset distances, which has been shared with the applicant.
- 6.46 The FRA and Drainage Strategy detail that a numbers of SuDS features will be used in the development: brown roofs on the apartment blocks; surface water will discharge into the SuDS basin within Robins Creek tidal inlet, as part of the Harbour Village drainage strategy; permeable paving will be used in some limited areas; oversized pipes; and, Geocellular tanks. The FRA show the lowest residential FFL as being at 8.4mAOD. The Environment Agency (EA) advise that a planning condition is required to ensure that the development is built in accordance with the FRA and no finished floor levels for dwellings below 8mAOD. They also require the agreement of the surface water drainage scheme as a pre-commencement condition and advise the use of an informative related to a Flood Risk Activity Permit.
- 6.47 In summary, it has been demonstrated that, subject to suitably worded planning conditions, the site is suitable for the proposed uses and will ensure protection against flood risk both on the site and within the wider area and as such complies with local and national policy and guidance with respect to flood risk for this development.

Access, Highways and Parking

- 6.48 Gravesham LPCS Policy CS11 supports proposals which improve public transport provision, in particular the expansion of segregated Fastrack bus lanes and bus priority measures and seeks new developments to mitigate their impact on the highway and public transport networks. LPCS Policy CS10 relates to physical Infrastructure and that *'where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development.'* 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.

- 6.49 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 115 requires that sustainable transport modes are prioritised, with safe and suitable access to the site to 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. Paragraph 117 requires, in part, that developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.50 EDC has published a Sustainable Travel Strategy (STS), which requires a level of parking that balances the needs of Ebbsfleet's residents without undermining the viability of city-wide high-frequency public transport, or the adoption of walking and cycling for shorter journeys.
- 6.51 The application site lies within a 'highly accessible' area, as identified in the STS, due to its location near to existing bus routes along Northfleet High Street and Northfleet Railway Station, as well as local shops at The Hive and a primary school. The east-west Fastrack route (strategic infrastructure), which comprises on road running for general vehicles as well as buses, would run through the site attaching to, and overlapping with, the 'Grove Road Highway Improvement Works' to the west and 'Bus Road West' RM permission to the east.

Access

- 6.52 Other than for the 2no. houses fronting onto College Road, the residential vehicle access route to the parking courts and parking spaces within the site are either via the north-south road which runs through Phases 3B of Harbour Village (being considered concurrently with this application) or from Phase 3A Hive Lane extension to the east through Phase 3B. Residential car parking is almost entirely within parking courts other than 2no. spaces within the very short section of street from Phase 3B. Residential visitor parking is also within the street from Phase 3B (1no. space) and within College Road (6no. spaces). There is no onward access through the site to other areas but the northward flow of traffic terminates within this development. Overall, the road layout for this 'extension' site is in general accordance with the residential masterplan for Harbour Village and will ensure a cohesive and legible scheme.
- 6.53 Unlike cars, pedestrians can filter through the site from south to north via the main public realm area between the apartment buildings, via a series of ramps and steps down to the Fastrack level. Pedestrians can then travel in either an eastern or western direction on the southern side of Fastrack or, having crossed Fastrack, to the east along the northern side of Fastrack or to the diverted King Charles III England Coast Path through the Riverside Park to be delivered as part of Phase 3A. Similarly, cyclists can permeate through the site on shared surface, including through the public realm with pedestrians. In a westward direction, on the northern side of Fastrack, the segregated pedestrian and cycle paths terminate at the approach to the SUDS park zone. There are two crossing points providing pedestrians and cyclists the opportunity to cross to the south side of Fastrack and cyclists can then rejoin the carriageway travelling west. On the northern side of Fastrack the shared pedestrian/cycle path will join the approved SUDS park footway to create a completed loop around the SUDS park.

- 6.54 A key strategic aspiration within the Development Plan and guidance is the delivery of, or at least the facilitation of the future delivery of, a continuous pedestrian and cycle route along the River Thames. This is intended to serve both leisure and recreational purposes and to contribute to the wider sustainable transport network. This aspiration is embedded within the Development Plan and aligns with the core 'sustainability' objectives of the NPPF, in particular the 'social' objective. The NPPF definition identifies the rivers as a form of 'open space', and its policies emphasise the importance of protecting open space and promoting sustainable travel networks. Furthermore, paragraph 183 of the NPPF confirms that Marine Plans form part of the Development Plan, with policies SE-ACC-1 and SE-TR-1 of the South East Inshore Marine Plan (2021) supporting inclusive public access and the promotion of tourism and recreational activities within the marine area. Gravesham LPCS Policies CS02, CS11 and CS12, together with the Ebbsfleet Implementation Framework, also seek to create and maximise public access along the River Thames, including the provision of continuous riverside paths. In addition, the Thames Estuary 2100 Plan supports this strategic approach to river access.
- 6.55 However, the adjoining Fastrack section to the west of the currently proposed development (the Grove Road Highway Improvement Works) was granted planning permission without a footway or cycleway on its northern side. This was due to constraints relating to the available highway width and concerns raised by the EA regarding wall loadings should new infrastructure be located closer to the harbour wall than the existing alignment. As a result, there is currently no feasible onward pedestrian or cycle connection to the west along the northern side of Fastrack. Notwithstanding this, discussions have taken place with the applicant regarding potential alternative opportunities to enable such a link in the future, so that the longer-term strategic objective is not precluded. It is also relevant to note that the Fastrack section within this full application is intended to fulfil an outstanding obligation from the OPP to deliver this section of highway infrastructure, including footways and cycleways, in lieu of a reserved matters application, noting that the OPP has now expired. The application boundary overlaps with the approved SUDS park planning permission, reflecting the fact that these developments are physically integrated and collectively implementing the master planned requirements of the former OPP.
- 6.56 In terms of an alternative westward route, the Ebbsfleet Implementation Framework identifies that the vacant land owned by EDC, located between the Grove Road Highway Works and the River Thames, will be brought forward in the future as a public park, likely delivered by EDC. This would complement the already approved SUDS park in Bellway ownership. From this future park, a westward riverside pedestrian and cycle route could then be provided through land within the administrative area of Gravesham, thereby enabling longer-term continuity of riverside access.



(Source: Ebbsfleet Implementation Framework – The Garden Grid)

Note: Star on the plan below is the Abacus Corner Employment site.

Note: Short dashed line showing pedestrian/cycle route along the riverside and the north side of Fastrack

- 6.57 Therefore, to ensure that the strategic aspiration for continuous riverside pedestrian and cycle access is not severed by the current proposal, the applicant has agreed to enter into a Section 106 obligation to secure the opportunity for an onward connection from the extended Harbour Village land, located on the northern side of Fastrack, to the EDC owned land to the west (separated by a river inlet), which is identified within the Ebbsfleet Implementation Framework as the location of a future public park. In the future a riverside park to the west of the approved SUDS park is expected to be delivered by EDC and high-level discussions with the applicant have been around EDC including a footway/cycleway boardwalk-bridge link to the applicant’s land/highway (OPP boundary land) as part of a future planning application for the park. The obligation is around the applicant working co-operatively with the EDC to enable a future link to their development.

Public Transport - Fastrack

- 6.58 The application seeks full planning permission and includes the ‘Abacus Corner’ section of the Fastrack bus corridor, which was secured through the OPP Section 106 Agreement but was not applied for or approved prior to the expiry of the outline permission. This section of Fastrack, shown in yellow on the plan below, runs east–west through the site and would provide direct public transport access to the development. Once complete, the Fastrack service would offer a frequent, high-quality connection to Ebbsfleet Central and Gravesham, with journey times of approximately 5–10 minutes.



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

- 6.59 The Fastrack section shown in yellow, as originally envisaged under the OPP, was of limited width and would have accommodated only single lane operation if delivered through a Reserved Matters application, as it was limited to land available within the existing highway boundary. In contrast, the current full application proposes a wider alignment capable of supporting two-way movement because it utilises land from Abacus Corner. This represents a clear improvement over the OPP scheme, delivering enhanced functionality and capacity along the Fastrack corridor, with consequent benefits for sustainable transport provision and traffic movement at both the local and wider network level.
- 6.60 The delivery of the Fastrack corridor as a continuous route is subject to a complex set of obligations secured through the OPP Phasing and Implementation Plan (PIP). Under the PIP, provision of the 'Bus Road West' section (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 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. In addition, the Grove Road improvement works (shown in purple) are secured through the OPP Section 106 Agreement to be delivered prior to first occupation of the 200th dwelling, a trigger currently in breach but subject to regular discussion and updates from the developer.
- 6.61 The 'Abacus Corner' section of the Fastrack corridor is subject to the same occupation trigger as Bus Road West and is required to be delivered prior to the 100th occupation of Harbour Village Phase 3A. This obligation has not fallen away notwithstanding the expiry of the OPP timeframe for submission of Reserved Matters applications. It is also material that Harbour Village Phase 3A, the proposed Phase 3B, and the current Abacus Corner proposal all incorporate a significant proportion of car-free residential units, comprising 86no. dwellings in Phase 3A and a further 42no. dwellings across Phase 3B and Abacus Corner. The acceptability of this approach is directly linked to the delivery of the Fastrack corridor and associated public transport provision. In this context, it is necessary and reasonable to require delivery of the Abacus Corner section of Fastrack prior to the occupation of any residential dwellings within this development, which should be secured by condition.
- 6.62 The proposed Fastrack road would be adopted by the Local Highway Authority. Kent County Council Highways raise no objection to the proposal, subject to standard conditions relating to visibility splays, surface water control, and the submission and approval of detailed construction specifications for roads, footways, verges and junctions.

Highway Impact

- 6.63 The highway impact of the wider mixed-use development approved under EDC/16/0004 were previously found to be acceptable, subject to a range of mitigation measures secured through the s.106 Agreement. These included a junction capacity assessment of Northfleet High Street / Hive Lane with associated improvement works if required, financial contributions towards a Traffic Regulation Order (TRO) at that junction, and delivery of the Fastrack route and bus stops. As the current proposal seeks full planning permission and was not assessed within the original OPP Transport Assessment, a standalone Transport Statement (TS) has been submitted in support of the application

- 6.64 The TS concludes that the traffic impact of the proposed development is not significant, reflecting both the relatively modest scale of the development and the existing uses on the site. The KCC Highway officer agrees that the calculated increase in vehicle trips within the TS is not anticipated to have a notable impact upon the local highway network.
- 6.65 The proposal also incorporates TRO works along College Road, affecting land both within and beyond the application site boundary, including new parking restrictions and the provision of 6no. on-street visitor parking bays. These measures replace elements of previously approved Section 278 works associated with Harbour Village Phase 2 and the concurrent Phase 3B Reserved Matters application. In addition to addressing visitor parking demand, the TRO would provide traffic-calming benefits and ensure a clear and unobstructed route for refuse collection and emergency vehicles serving both Harbour Village and Abacus Corner. While the TRO is considered in detail within the parking assessment below, it is material to highway impact considerations, as failure to secure the TRO would have implications for safe access and servicing. Accordingly, the Local Highway Authority has requested the imposition of two Grampian-style conditions to ensure the TRO is secured prior to occupation, as discussed further below.

Parking

- 6.66 Although the proposal would essentially extend the Harbour Village development, it is not subject to the parking standards previously agreed under the OPP. While GBC parking standards remain a consideration, these are now relatively dated. Therefore, in this instance, the residential parking guidance set out in the EDC Sustainable Travel Strategy (STS) is considered to be most applicable for the assessment of parking levels for this proposal. The STS seeks to avoid over-provision of parking, particularly in highly sustainable locations such as this site, where residents are expected to make greater use of alternative modes of transport. This approach is especially relevant given the planned operation of the Fastrack bus service through the site.
- 6.67 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	STS – Highly Accessible Area	No. Spaces Proposed
Residential: 1 & 2-bed flats (0 - 0.8) 3-bed houses (0 – 1.2)	from 0 to 52.8 from 0 to 2.4 Total = 0 to 55 (rounded down)	Total = 32
Visitor	20% of total = 0 to 11	= 8 spaces* *Comprising 2 on private streets and courts, and 6 within the public highway (whereby 6 spaces are proposed replacing existing 3 spaces)
Car Club	= 0	= 0
Total	0 to 55	40
Cycle provision	1 space per bedroom = 72	= 72 plus visitor

6.68 The application proposes 68no. units, comprising 66no. apartments and 2no. houses. Each of the houses would be provided with a garage parking space, while the applicant advises that 36no. of the apartments will be designated as 'car-free' units and 30 spaces will be provided on this site for the 66 apartments.



(Source: Proposed Site Layout - Parking Strategy)

6.69 Residential parking would be managed through a permit-based system in accordance with the submitted Framework Site Wide Parking Management Plan (FSWPMP), with parking allocated across defined zones rather than to individual units. Indicative parking zones are appended to the FSWPMP confirming Abacus corner will be provided across zones 7 and 4.



(Source: FSWPMP : Indicative Parking Zones – Harbour Village including Abacus Corner)

6.70 A total of 30no. parking spaces are proposed to serve the 66no. apartments, resulting in 36no. car-free units within the Abacus Corner scheme. The FSWPMP identifies that Parking Zone 4 would serve both the Phase 3B apartments and the eastern apartment block at Abacus Corner, allowing for some redistribution of car-free units between the

two sites and resulting in a total of 42no. car-free units across Phase 3B and Abacus Corner combined. Within the Abacus Corner element alone, this equates to a parking ratio of approximately 0.47 spaces per unit, excluding visitor parking.

- 6.71 Furthermore, Reserved Matters approval for Harbour Village Phase 3A (ref. EDC/23/0086) included provision for 86no. car-free dwellings. The supporting FSWPMP at that time established a managed permit system whereby the number of parking permits issued would be limited to the number of spaces provided, with no dwelling eligible for more than one permit. Priority for permits would be given to first purchasers of 2 and 3 bedroom units, with any remaining permits offered to 1 bedroom units only after this initial process is complete. The FSWPMP also allowed for permits to be surrendered on resale, enabling them to be reallocated to other residents if required. Cumulatively, if Phase 3A, Phase 3B and the Abacus Corner proposal are all implemented, this northern part of the Bellway development would comprise 128no. car-free dwellings out of a total of 380no. units. While the introduction of car-free housing supports sustainable travel objectives, it has the potential to result in parking overspill onto surrounding streets, which are already subject to high parking demand, to the detriment of existing residents.
- 6.72 It is also relevant when considering parking matters that Fastrack buses would only start running through the Harbour Village/Abacus Corner sites in the very late stage/complete occupation of the Harbour Village 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.
- 6.73 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 planning obligation securing measures to introduce a Controlled Parking Zone (CPZ) / Permit Parking Area (PPA) in the surrounding area. The obligations comprised financial contributions towards: the design, consultation and advertisement of a Traffic Regulation Order (TRO); implementation of the CPZ/PPA including lining and signage; and ongoing enforcement and any necessary amendments to nearby controlled parking arrangements to address development related parking impacts.
- 6.74 The CPZ/PPA secured under the Phase 3A agreement applies to adopted highways within a 750-metre radius of the application site.
- 6.75 Should the Abacus Corner development be implemented in advance of the CPZ/PPA being introduced under the Phase 3A RM approval, there would be a risk of parking overspill into surrounding streets arising from the car-free nature of some units. It is therefore necessary to secure equivalent CPZ/PPA obligations within the Abacus Corner legal agreement. To avoid duplication, the contributions would be payable once only, triggered by whichever development proceeds first. The applicant has agreed to this approach.
- 6.76 A planning condition attached to the Phase 3A RM approval required details of how prospective purchasers would be informed of parking management arrangements and spaces allocation, including through the marketing process. KCC Highways considered this essential to ensure purchasers (particularly of 1 bed apartments) were aware that on-site parking is permit-controlled, that there is no automatic right to park, and that a Controlled Parking Zone in surrounding streets is being funded to prevent

overspill parking. It is considered appropriate and necessary for an equivalent condition to be applied to the current proposal.

6.77 During the course of the application, the red line boundary was expanded to incorporate 6no. on-street parking spaces within College Road public highway, upon which the development would rely. The spaces would replace 3no. existing unrestricted spaces (subject only to a morning two-hour restriction to deter commuter parking) and are intended to provide visitor parking for the Harbour Village and Abacus Corner developments, as well as nearby existing uses that currently have access to on-street parking in College Road. The 6no. spaces would be subject to a four-hour maximum stay and enforced by Gravesham Borough Council (GBC) Parking Services, who have confirmed their agreement to assume responsibility for enforcement.

6.78 The 6no. visitor spaces would be delivered through an amendment to the existing Traffic Regulation Order (TRO), which is subject to a statutory public consultation process and therefore cannot be guaranteed to proceed. GBC Highways would be responsible for the design, consultation, advertisement, implementation and signage associated with the TRO, subject to the developer securing and funding these works. GBC has agreed in principle to undertake these processes, subject to the following financial contributions being secured:

- £3,000.00 to Gravesham Borough Council towards undertaking a design, consultation and advertising exercise for amendment of the existing Traffic Regulation Order (TRO) in College Road public highway, to provide the six new parking spaces and lining proposed by the applicant as part of the development, to be paid prior to commencement of either EDC/25/0104 (Abacus Corner) or EDC/23/0078 (Harbour Village Phase 3B), whichever is sooner
- £2,000.00 to Gravesham Borough Council towards introducing the new six parking spaces in College Road proposed by the applicant as part of the development, including costs associated with lining and signage, to be paid following TRO public consultation and agreement to proceed with the TRO in College Road

6.79 In addition to the financial obligations outlined above, and in recognition of the need to secure the TRO amendment at an early stage, KCC Highway officers require the use of two Grampian-style conditions to address the highway impacts associated with the proposed College Road parking arrangements. Both the Abacus Corner development and concurrent Harbour Village 3B proposals are dependent on the successful implementation and operation of the TRO to ensure safe access for refuse and emergency vehicles, provide traffic-calming benefits, and maintain unobstructed access to the terraced properties fronting College Road. In the absence of such controls, KCC Highways would maintain an objection on highway safety and network operation grounds. The originally requested two-stage Grampian controls have been combined into a single two-stage condition (Condition 10), which would require:

“No part of the development hereby approved, except site clearance and demolition works, shall commence until a copy of Traffic Regulation Order (TRO) amendment, approved by the Local Highway Authority, to provide the 6no. visitor parking spaces within the College Road public highway as shown on drawing ABC-BPTW-S01-XX-DR-A-0150 rev C04 (Parking Strategy), has been supplied to the Local Planning Authority. Thereafter the development shall not be occupied until the requirement of the agreed and supplied TRO amendment have been carried out in full.”

6.80 If the TRO amendment were not to be successful, the combined Abacus Corner and Phase 3B developments would fail to deliver sufficient visitor parking and, more

critically, could lead to localised parking obstruction and highway safety issues along College Road. In these circumstances, the condition would need to be varied by the applicant to secure alternative, acceptable solutions to ensure safe access and prevent obstructive or unsafe parking and vehicle movements along College Road occurs.

Parking Management

- 6.81 A FSWPMP has been submitted with the application and is intended to operate as a single management document across the Harbour Village development, including the Abacus Corner extension. It is noted that this version differs from versions seen under earlier phases. In particular, it proposes that visitor parking within private areas may be used without a permit for up to 6 hours, compared to the 4 hour maximum previously allowed under Phase 3A. Given the limited visitor parking provision across Harbour Village this increase is considered inappropriate. The applicant has agreed that the unpermitted visitor parking period will be reduced to 4 hours, to be secured via condition for a single FSWPMP.
- 6.82 KCC Highway officers have also identified additional matters that must be addressed within a revised Parking Management Plan, including: 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; details of how inappropriate parking outside of designated bays will be prevented; details of the monitoring methodology.
- 6.83 A Parking Management Plan (PMP) can be appropriately secured by planning condition. The applicant has, however, advised that a revised and consolidated single PMP covering Abacus Corner as part of the extended Harbour Village development will be provided to fulfil that condition, which is considered to be appropriate.

Car Club

- 6.84 No additional car club spaces will be located within this site but the submitted FSWPMP advises that new residents will have access to the 3no. approved car club spaces/cars within 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 Abacus Corner residents would therefore be within Phase 3A, where a condition requires a car to be in place and operational prior to first occupation.
- 6.85 The Phase 3A proposal also allowed for a 4th space being provided should the desire/need develop. As the application site is being treated by the applicant as an extension to Harbour Village by virtue of the single Framework Travel Plan, it should be required that Abacus Corner residents have use of the car club. However, should Abacus Corner come forward ahead of Phase 3A, and also ahead of Fastrack, no sustainable travel options of car clubs or Fastrack buses might be available and as such the risk of car-free unit occupiers relying on car travel is higher and the need to implement a CPZ is therefore underscored.

Electric Vehicle (EV) Charging

- 6.86 33no active EV chargers are proposed serving the 2 houses, 30 parking spaces identified to serve the apartments through the permit scheme, and 1 visitor parking within the western parking court. As such, the proposal will meet the requirements of

current Building Regulations with all allocated resident spaces having an active EV charger. Notwithstanding this, the KCC Highway officer requests the use of conditions to secure the provision of 33no. active EV charging spaces as a minimum, with minimum output of 7kw; that all EV chargers for homeowners be Mode 3 standard and SMART units, enabling wifi connection; that details 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 should be the subject of a planning condition.

Cycle Parking

- 6.87 Secure cycle storage is to be provided for all units, within secure communal cycle stores within apartment blocks and within rear garden sheds for the houses, with ground anchors to securely lock bicycle. The parking provision will meet the EDC STS levels of 1 space per bedroom and in the cycle store for flats these will be managed by the building management company. Visitor cycle parking will be installed at the highest part of the public realm area in two areas of Sheffield stands. The FSWPMP states that monitoring of visitor cycle parking will be undertaken during the yearly traffic and travel plan monitoring within the Harbour Village OPP requirements and it advises that any issues with the visitor cycle parking arising at other times of the year can be raised with the Management Company. A planning condition would secure the provision and retention of cycle parking.

Residential Travel Plan

- 6.88 The applicant proposes that the development operates as an extension to the wider Harbour Village scheme. However, as this application seeks full planning permission, it is not subject to the existing OPP Residential Travel Plan approved under reference EDC/22/0096.
- 6.89 At the time the OPP Residential Travel Plan was approved, the Harbour Village scheme did not include any car-free dwellings. The introduction of a revised parking strategy, including a significant number of car-free units, was later approved through the Phase 3A Reserved Matters permission (ref. EDC/23/0086). That permission was granted subject to a condition requiring an updated Residential Travel Plan to address the changed circumstances. This secured specific measures including: provision of at least one operational car club space with associated electric vehicle charging; identification of temporary car club provision during construction; operational arrangements for the car club; and promotion of one year's free car club membership per household.
- 6.90 As the Abacus Corner proposal is not bound by the OPP Residential Travel Plan, a suitably worded planning condition is required to secure equivalent sustainable travel benefits, reflecting the presence of car-free units. Kent County Council Highways have advised that the condition should include access to the Harbour Village car club and the provision of car-club vouchers on demand.
- 6.91 In addition to the above, KCC Highway officers also request conditions related to the provision and retention of parking spaces prior to first occupation, no changes to the two garage parking spaces that would result in the loss of car parking spaces on site, and the submission and approval of a Construction Management Plan (CMP).

Summary

6.92 The NPPF in paragraph 116 of NPPF (2024) 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. Subject to the implementation of a parking permit area in surrounding streets, (in the form of CPZ), the securing of the required TRO amendment through legal obligations and associated Grampian-style condition, and the imposition of planning conditions relating to parking management, access to Harbour Village car clubs, a Residential Travel Plan, EV charging, provision and retention of parking and visibility splays, and a Construction Management Plan, the proposed access, parking arrangements and wider highway impacts are considered acceptable and compliant with relevant policy and guidance.

Affordable Housing and Financial Viability

6.93 Gravesham LPCS Policy CS16 requires the provision of 30% affordable housing on all residential developments of 15 dwellings or more, or on sites of 0.5 hectares or more within the urban area, subject to site viability and an appropriate tenure mix to meet local needs. Current housing needs data (February 2025) provided by GBC housing team indicate significant demand for affordable rented accommodation, totalling 971 households, with the highest need for one and two bedroom units:

Property Type	GBC number of new Affordable Rented dwellings required	Percentage of required Affordable Rent dwelling sizes
1-Bed	284	29%
2-Bed	353	36%
3-Bed	237	24%
4Bed+	97	10%
Total	971	

6.94 The proposal includes 20no. Discount Market Sale (DMS) apartments, equating to 29.4% of the 68 dwellings proposed. The DMS provision would comprise 8no. one-bed units, 2no. two-bed three-person units, and 10no. two-bed four-person units. A Financial Viability Assessment (FVA) has also been submitted in support of the application.

6.95 The NPPF confirms that the delivery of affordable housing is a key objective for major, residential development and includes Discount Market Sale housing within its glossary of affordable housing definitions. DMS housing is defined as housing sold at a minimum 20% discount below local market value, with eligibility linked to local incomes and house prices and safeguards in place to ensure the discount is retained for future eligible occupiers.

6.96 DMS units are sold on a freehold or long-leasehold basis, with purchasers owning 100% of the property but required to pass on the minimum discount on all future sales or transfers, secured through a restriction on the title in perpetuity. No registered provider is involved, and occupiers are responsible for maintenance and associated costs, consistent with private ownership.

6.97 Where DMS properties are secured, they will be restricted by planning obligation to make sure that a discount of at least 20% is applicable every time the property is sold or transferred, in perpetuity, to an eligible buyer. Eligibility criteria relate to

demonstration of local connection and household income thresholds is also required. This is achieved via a restriction on the title - which will apply for any sale, transfer of equity, re-mortgage, or any other form of disposal.

- 6.98 The submitted FVA concludes that, due to site specific viability constraints, there is no financial capacity to support a policy compliant level or mix of affordable housing or other s.106 contributions. This conclusion has been independently reviewed by the Ebbsfleet Development Corporation's viability consultant, who agrees that a DMS only affordable housing offer would maximise the development's viability.
- 6.99 It is acknowledged that DMS housing does not address the substantial unmet need for affordable rented housing and does not permit local authority nominations. It is an intermediate product, similar in nature to shared ownership or First Homes, and is therefore more likely to meet the needs of households who might otherwise seek alternative intermediate tenure options.
- 6.100 Notwithstanding this, both Policy CS16 and the NPPF explicitly recognise that affordable housing provision must be informed by viability considerations. In this case, there is no policy objection to the delivery of 29.4% affordable housing, marginally below the 30% requirement, or to the provision being wholly in DMS tenure. The proposed 20 DMS units are therefore considered acceptable and will be secured through the Section 106 Agreement.

Housing Mix, Standards and Residential Amenity

- 6.101 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 and designed in accordance with the *Residential Layout Guidelines SPD (1996)*. Paragraph 198 of the NPPF seeks to ensure new development provides a high standard of amenity and avoids adverse impacts on health or quality of life.
- 6.102 The Nationally Described Space Standards (NDSS, 2015) set out minimum Gross Internal Areas (GIAs) and bedroom sizes for all new dwellings. These standards supersede the GIA requirements within Gravesham's 1996 SPD. 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.
- 6.103 In terms of outside space, the NDSS does not provide a standard for external amenity space. The Gravesham Residential Layout requires self-contained apartments, which have two or more bedrooms, to have either 10sqm of amenity space per unit, either privately or as part of a communal space. The EDC Design Guidance requires that '*All private balconies and roof terraces must provide a generous balcony, that is larger than 5 m2 for each 1-2 person dwelling, plus 1 m2 for each additional occupant over 2 persons*'. All of the units meet or exceed the minimum private balcony sizes bar one which is nominally less. In addition, all residents will have access to the Riverside Park open space, to be provided as part of the Phase 3A Harbour Village development (timing controlled by the OPP Phasing and Implementation Plan), in addition to the Chimney Park play space, which is already delivered in Phase 1B, and the Bevans/Heritage Park that is under construction and to be delivered imminently. Due to the changes in land levels through this area, the high density of development and small garden sizes related to the two houses, it is recommended to restrict specific householder permitted development rights for the this development.

- 6.104 Regarding housing mix, it is recognised that high-density residential development is appropriate and encouraged by planning policy in highly sustainable locations. Within the Harbour Village development, this has been realised through the delivery of four-storey apartment blocks along the southern side of Fastrack, and the current proposal continues this approach. Other than two houses, this development comprises all apartment dwellings, including a mix of one-bedroom units and two-bedroomed apartments designed for 3 and 4 occupants. When considered cumulatively with the wider Harbour Village development, including the proposed Phase 3B, the overall provision comprises 258 houses and 399 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 sizes provided, the proposed housing mix is considered acceptable.
- 6.105 The NPPF requirements for housing to meet the needs of groups with specific housing requirements including people with disabilities is addressed by the provision of 61no. apartments which will be compliant with Building Regulations Part M4(2) 'Accessible and Adaptable Dwellings', ensuring these dwellings will be capable for adaption to meet the housing needs of those identified with mobility needs. The remainder of the apartments and the 2 houses would meet Building Regulations Part M4(1) 'Viable Dwellings'. Whilst the provision of 90% M4(2) dwellings is appreciated, and there is no policy conflict in this regard, it is disappointing that no M4(3) 'Wheelchair User Dwellings' are proposed. Notwithstanding this, a small number of such units are provided in the wider Harbour Village development. The M4(2) unit compliance should be secured by planning condition.
- 6.106 Accordingly, the proposed development would provide an acceptable mix and standard of residential accommodation, consistent with Policies CS19 of the Gravesham Local Plan Core Strategy (2014), the Nationally Described Space Standards (2015), and the overarching amenity objectives of the NPPF.

Noise – for future occupiers

- 6.107 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, 196 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.
- 6.108 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). 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.
- 6.109 As the site lies within 250m of a safeguarded wharf and minerals infrastructure the proposal is therefore required under the 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.

6.110 The application is supported by an acoustic report, together with additional notes to provide clarification in response to officer queries and representations from both the Port of London Authority (PLA) and the consultant appointed to represent the interests of Holcim Industries Ltd (Holcim) and Brett Aggregates Ltd (Brett) who operate from the wharf.

6.111 The PLA, Holcim and Brett advised of concern in respect to the agent of change principle, particularly regarding balconies and apartments served by windows and balconies on the western elevation of the western block, facing WE Roberts Ltd and the operational wharves. They were 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.

6.112 The following noise sources have been identified as affecting the application site:

- Nearby industrial uses, particularly WE Roberts Ltd factory
- Robins Wharf operations to the north-west 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

6.113 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 and traffic is unlikely to have an adverse impact on the proposed residential receptors subject to mitigation in the form of high-performing double glazing (in facades facing Fastrack, College Road and facing the public realm steps/slope area) and the installation of Mechanical Ventilation Heat Recovery (MVHR) systems which will be required for these units so that windows can remain closed in the overheating condition. These mitigation measures are required to be secured by planning condition.



(Source : Noise Impact Assessment – red facades to have MHVR)

- 6.114 Regarding external amenity noise levels, the noise levels on a number of external balconies may exceed the upper value of 55dBA for external amenity areas on proposed balconies. 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 alternative quieter external amenity areas 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

- 6.115 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. 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, adjacent industrial operations and the operational wharf. In addition, a condition has been included to mitigate potential light glare impacts on future residents arising from lighting within the WE Roberts Ltd site (as discussed further in the 'Amenities' section of this report). 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

- 6.116 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 – 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.

Neighbouring Amenity

- 6.117 Policy CS19 of the Gravesham Local Plan Core Strategy (2014) requires 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.
- 6.118 Adjacent to proposed residential properties, to the south and east, would be dwellings within Harbour Village Phase 3B (EDC/23/0078) site, under consideration concurrently, and employment uses to the west. A development platform has been completed for the Harbour Village development and finished land levels through the Harbour Village site would fall gradually as travelling north. Currently the Abacus Corner employment site remains at its existing ground level which is around 2.5m lower than the Phase 3B application site to the south and east. The eastern block proposed also is at a higher ground level to the western block, with land levels falling across the

site from east to west. Consequently, the western block is proposed with the lower ground floor level of the block being inactive.

- 6.119 The orientation and relative location of the proposed apartment blocks, and the 2 proposed houses, to the dwellings within Phase 3B are such that no detrimental impacts upon the amenity of the Phase 3B properties would occur through loss of privacy, daylight, outlook or overshadowing from the proposed development, and vice versa. The proposals are therefore not considered to detrimentally impact neighbouring residential amenity.
- 6.120 In relation to neighbouring commercial operations, the impact of the development upon their operation is most critically considered under the 'agents of change' section of this report.
- 6.121 Furthermore, a planning condition is also required to secure the agreement of a Construction Environmental Management Plan (CEMP) which would control matters related to construction working such as the routing of construction traffic, hours of working, suppression of dust, wheel washing etc. Operation in accordance with the agreed CEMP would ensure protection of the neighbours' living conditions during construction. The KCC Highway officer has also requested the CEMP include matters such as: the routing of construction and delivery vehicles to / from site; parking and turning areas for construction and delivery vehicles and site personnel; timing of deliveries (avoiding network and school peaks where possible); provision of wheel washing facilities; measures to prevent the discharge of surface water onto the highway; temporary traffic management / signage'; provision of measures to prevent the discharge of surface water onto the highway – all of which will also ensure protection of the neighbours' living conditions during construction.

Contamination

- 6.122 LPCS Policy CS19 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 proposals take account of ground conditions risks arising from contamination, potentially from former land uses, and any required mitigation. Paragraph 198 requires decisions to take 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. 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.*'
- 6.123 The industrial use of the application site and historic land uses within its vicinity means that it is at risk of contamination. A 'Geoenvironmental Assessment Report' has been submitted in support of this application. A Phase 1 (non-intrusive) investigation and Phase 2a (preliminary exploratory) investigation have been undertaken and the findings presented in the report. There is reported made ground across the accessible parts of the site from 0.4m to 1.6m depth. Sampling identified areas of contamination comprising lead, hydrocarbons, asbestos, pH and phytotoxins in areas of made ground and the risk of exposure of future residents from soil contamination was concluded to be moderate. Following initial gas monitoring visits to the site the site is considered as being at moderate risk from ground gases. Furthermore, the site also lies within a Source Protection Zone as the chalk underlying the application site has been designated as a Principal Aquifer by the Environment Agency.

- 6.124 Having reviewed the submitted documents, the Environment Agency is satisfied that the proposal would not pose an unacceptable risk of contamination to groundwater. This conclusion is subject to the imposition of planning conditions requiring further site investigation, the approval and implementation of an appropriate remediation strategy (where required), verification of completed remediation works, procedures for dealing with unexpected contamination, prior approval of any intended piling works, and the submission and approval of surface water drainage details.
- 6.125 EDC's contamination consultant advises that additional monitoring be completed, in line with current guidance for a moderate risk of ground gases and a high sensitivity end use (residential) and testing also take place in the areas that could not be accessed to date. Following the additional monitoring and any further investigation, an updated risk assessment and remediation strategy should be submitted for review, based on the current development proposal layout which should include a watching brief approach during the works for any further contamination, particularly in the vicinity of the elevated petroleum hydrocarbons where further contamination may be encountered during the development.
- 6.126 Therefore, subject to suitably worded planning conditions, the proposal is considered to adequately mitigate risk to groundwater and the health of future occupiers. The development therefore complies with LPCS Policy CS19 and paragraphs 196 and 198 of the NPPF.

Air Quality

- 6.127 LPCS Policy CS03 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.
- 6.128 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. Although the application site previously lay within the AQMA, its revocation does not remove air quality as a material planning consideration, and assessment of potential impacts remains necessary.
- 6.129 An Air Quality Assessment has been submitted with the application which acknowledges the revoked AQMA and identifies that construction traffic could pass through the Dartford Borough Council London Road AQMA along the A226, approximately 500 metres from the site, which was declared in relation to annual mean nitrogen dioxide (NO₂) exceedances. The assessment concludes that, when compared with the existing lawful use of the site, the development would result in no significant operational air quality impacts and that no further mitigation is required. It also identifies that measures embedded within the Framework Travel Plan to reduce vehicle trips would exceed the calculated damage costs of the scheme. This assessment has been reviewed by EDC's air quality consultant, who agrees that the conclusions are robust and that the site is suitable for residential use.
- 6.130 Responsibility for air quality monitoring and implementation of Air Quality Action Plans lies with the local authority, in this case Gravesham Borough Council. No request has been received from the Council for financial contributions towards air quality monitoring or the delivery of its Action Plan.

- 6.131 Notwithstanding the absence of a formal damage costs assessment, the low parking provision, incorporation of sustainable travel measures and Travel Plan incentives is considered sufficient to mitigate any potential adverse air quality effects arising from the development. In respect of construction related dust and elevated PM10 concentrations during demolition and buildout, the EDC's consultant recommends the inclusion of dust control measures within a Construction Environmental Management Plan. This would be secured by condition and ensures compliance with Policy CS03 of the Gravesham Local Plan Core Strategy and paragraph 199 of the NPPF.
- 6.132 In summary, subject to suitably worded planning conditions, the development is considered to provide a high-quality 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.

Heritage and Archaeology

- 6.133 Policy CS20 of the Gravesham Local Plan Core Strategy gives high priority to the preservation, protection and enhancement of the borough's heritage and historic environment. When considering the impact of a proposed development on heritage assessment the decision maker will have regard to the scale of the harm and the significance of the asset. Saved Policy TC7 of the Gravesham Borough Local Plan First Review says that applications will normally be refused unless arrangements have been made to allow for satisfactory archaeological investigation.
- 6.134 Paragraph 207 of NPPF states that where development on a site has the potential to include heritage assets with archaeological interest a desk-based assessment and, where necessary, field evaluation should be submitted. Paragraph 214 says that where a development would lead to less than substantial harm to the significance of a heritage asset the harm should be weighed against the public benefits of the proposal.
- 6.135 In this case the applicant has not submitted the required desk-based assessment for archaeology but states they *'consider that extensive archaeology surveys of the adjacent site have been completed with significant recording. The previous buildings on this part of the site would have likely disturbed any under-ground archaeology and the potential for archaeological remains is considered low in the applicant's view.'*
- 6.136 However, the County archaeologist advises that there is a risk of potentially significant costs and time requirements on the developer for archaeological evaluation and mitigation in this area. The area in the 19th and early 20th century, as the cement industry expanded, included two public houses and residential housing around Warwick Place. The site is likely to have a significant archaeological interest for remains associated with the evolving social and domestic aspects of life in Northfleet as the cement industry developed. There may also be surviving remains for pre-industrial activity as well. The County archaeologist therefore considered that archaeological work will require field evaluation followed by detailed evaluation and mitigation excavation, recording, analysis, and publication. KCC is content that the buried remains at this site are unlikely to be of such significance that they would require pre-determination field evaluation and as such recommend the use of a pre-commencement planning condition to secure the required level of archaeological investigation, mitigation excavation, recording, analysis, and publication.

- 6.137 Known within the site itself is a historic plaque that the applicant has identified within their DAS as to be relocated and re-installed within the site. The existence of this plaque was also raised during early pre-application discussions and following input from a local councillor at that time.



Existing historic plaque retained and re-purpose into a concrete wall

- 6.138 Without interpretation the plaque could remain without an available story but it has been discussed and agreed between the applicant, EDC and the County archaeologist that the Abacus Corner application site heritage and archaeological investigation should feed into the Harbour Village site wide approach to the design and content of the OPP Heritage Management Plan (HMP) interpretation boards. The interpretation boards and trail will need to cover the whole of the Northfleet Embankment West development site as a whole and not on a phase-by-phase or separate-site basis. However, until the archaeological post-excavation assessment and analysis has been completed the final location and content to the series of interpretation boards cannot be agreed. As such this will need to be secured by a suitably worded planning condition.

Public Art and Heritage Interpretation

- 6.139 Whilst the application site does not fall under the Harbour Village OPP it is proposed as a cohesive extension to that development and the submitted Design and Access Statement (DAS) states '*Public art and heritage interpretation will cover the Harbour Village site and include Abacus Corner as a whole.*' As such the approach to public art for the Harbour Village site is relevant. The committee report for the residential masterplan application (EDC/20/0080) reads "*The approach to embedding heritage into the public realm and the three main parks is welcome, and potentially more sustainable and engaging than a piece of art work such as a sculpture. This also presents an opportunity for co-design with the local community, as advocated by the local ward councillors...*"
- 6.140 Within the DAS the applicant refers various aspects of the proposed western flat block architecture as reflecting local heritage and '*providing opportunity for public art*'. They propose painted motifs on '10 corrugated metal arches' as part of the lower ground floor elevation of the western apartment block, as well as '*two bespoke motifs [that] mark the arrival corners of the site*', again on proposed metal arches either side of the northwestern corner of the block.
- 6.141 In respect to Heritage Interpretation the architectural references within the buildings to heritage matters of the area is acknowledged, but other than in relation to the redesigned lower ground floor level of the western apartment block, following the deletion of the commercial unit from the application, the DAS is light on detail. It refers to being generally inspired by the heritage of the area and the materials palette for the

public realm and landscape concept being inspired by the cement manufacturing processes which once operated on the site, with the public realm terraces following the story of 'quarry', 'kiln' and 'cement and water' in its hard landscape materials from south to north.



(Source: Design and Access Statement)

- 6.142 In the absence of specific proposals this aspect of the character and identify of the development is unmet. The DAS for previous Phase 3A of Harbour Village advised that an artist would be appointed to work collaboratively with the site architects and would be encouraged to explore a range of community engagement approaches when developing their concept work. It also referred to consultation with the EDC with respect to the EDC Public Art Strategy and the potential for collaborative working with the community and local artists and the exploration of a connective heritage route through Harbour Village utilising embedded art within the landscape, street furniture and buildings.
- 6.143 The EDC Cultural Development Manager recommends that a public arts consultant be procured to lead the commissioning of the facade art work proposed at the lower ground floor level of the western building for this development. This commissioning would effectively be as an extension of the Public Art Strategy for the Harbour Village site. The applicant has emphasised the current proposal forms a holistic part of the Harbour Village development and occupies the 'gateway' site to Harbour Village and as such the art strategy for this site needs to form part of the attention of the above 'collaborative working' for this key development. It is recommended that this is secured by planning condition.

Sustainability

- 6.144 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.

6.145 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.

6.146 The applicant has submitted a completed version of EDC’s Sustainability Assessment table. The table provides an at-a-glance summary of the scheme’s sustainability credentials. It is organised into five themes, with each theme broken down into specific criteria assessed using a colour-coded scale indicating different levels of achievement (Will not deliver net zero, Towards Net Zero, and Aspirational for Whole Life Carbon).

6.147 For this proposal the summary table below has been produced:

Sustainability Themes / Performance Measure	Please select Sustainability Level achieved in each measure		
Carbon & Energy			
Whole life Carbon	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Upfront Carbon	Houses	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Apartments	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Passive Design : Space heating	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overheating	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy efficiency : Energy Use Intensity (EUI)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Renewables	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy Management	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Waste & Materials			
Circular sourcing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Responsible sourcing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
End of life reusability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Offsite Manufactured, MMC, Pre-manufactured	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health & Wellbeing			
Local Amenities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cycle parking & facilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Car club	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Transport connections	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Housing Quality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Healthy materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
External daylight and sunlight	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internal daylighting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dual aspect	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water			
Sustainable Urban Drainage Systems (SuDs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Surface water run off	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potable Water use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Collection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Natural Environment			
Biodiversity Net Gain	N/A	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Urban Greening Factor	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
Tree Canopy cover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Green Roof coverage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Food growing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sustainability Assessment Summary Checklist

- 6.148 The EDC Environment and Sustainability Manager review of the submission confirms that in respect to the ‘Carbon and Energy’ sustainability theme the application submission has not provided items around the provision of ‘Energy Use Intensity’ (EUI) predictions but is meeting Part L of Building Regulations. The demonstration that PV will meet the energy demand for landlord areas is secured by planning condition and smart meters are to be provided. In relation to ‘Waste and Materials’ theme the submission, included in the Circular Economy Statement, evidences compliance with minimum requirements. Health and Wellbeing theme performs mostly above minimum requirements, but some apartment dwellings are single aspect east, west or north facing and as such in terms of internal daylight and dual aspect the theme scores less well. For the ‘Water’ theme the betterment over basic requirements is gained in the use of SUDS features. In respect to the ‘Natural Environment’ theme the increase in planting and biodiversity measures are very significant, as expected, for the proposed residential development compared to the current employment park use and historic quarry use of the site.
- 6.149 An Energy and Sustainability Statement (ref. 332612492 V2, February 2026) has also been submitted in support of the application. The Statement has been prepared in accordance with the recognised energy hierarchy, outlining the applicant’s approach to operational energy efficiency, water consumption and wider sustainability measures. It confirms an ambition for all dwellings to achieve an EPC ‘A’ rating where practicable through the combined effect of fabric efficiency, building services and renewable technologies.
- 6.150 The proposal adopts a fabric first approach, with the applicant indicating that building fabric performance would exceed minimum standards set out in Building Regulations Part L (2021). Measures include enhanced insulation, low air permeability targets and high-performance glazing, which are intended to reduce energy demand. A fully electric strategy is proposed, incorporating air source heat pumps, mechanical ventilation with heat recovery and low energy lighting throughout, with secondary electric heaters provided where required. Indicative SAP modelling demonstrates that the development would achieve a Dwelling Emission Rate (DER) significantly below the Part L (2021) Target Emission Rate (TER), equating to an approximate 73% reduction in regulated carbon emissions relative to that benchmark. This indicates a substantial improvement over the minimum regulatory requirements and confirms that the scheme is capable of complying with Part L. Notwithstanding this, the results are indicative at this stage and would be subject to detailed verification and compliance at Building Regulations stage.
- 6.151 The table below illustrates the estimated performance of the dwellings within the Proposed Development with regards to the Building Regulations Part L 2021 TER, Target Fabric Energy Efficiency (TFEE) and Target Primary Energy Rate (TPER) which is reflective of the direction of travel required by the Future Homes Standard which was published in March 2026 and which will come into force for new development from March 2027.

Table 3.2. Part L 2021 Compliance (SAP 10 results) – Dwellings

Annual Performance Measure	Target	Actual	% Reduction
CO ₂ emissions (kg CO ₂ /m ²)	14.5	3.9	73%
Fabric Energy Efficiency (kWh/m ²)	40.5	32.3	20%
Primary Energy (kWh/m ²)	77.0	41.7	46%

(Source: Energy and Sustainability Statement ref. 332612492 V2, February 2026)

- 6.152 Renewable energy generation is proposed in the form of roof-mounted photovoltaic panels located on the flat roofs of the apartment buildings, intended to serve landlord-controlled and communal areas only. Brown roofs are also proposed in these locations. 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 (2021). Final details of the PV installations would require further refinement and are recommended to be secured by condition.
- 6.153 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 105–109.7 litres per person per day would meet the optional Part G requirement of 110 litres per person per day, consistent with commitments set out in the approved residential masterplan. Measures to reduce water use during construction are also identified. Subject to appropriate conditioning, the approach to water efficiency is considered acceptable.
- 6.154 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, the scheme incorporates a range of wider sustainability measures through its layout, infrastructure and Travel Plan commitments. These include electric vehicle charging provision, the promotion of more sustainable modes of travel and placemaking, through the provision of a section of strategic bus route, car club access and vouchers, and cycle facilities. Further measures include the use of permeable paving, sustainable drainage directing surface water to the SuDS park, and the delivery of Biodiversity Net Gain. Collectively, these measures contribute to the sustainability credentials of the development, although their overall effectiveness would be dependent on detailed implementation and ongoing management.
- 6.155 The proposal includes commitments to sustainably sourced timber and high levels of construction waste diversion, supported by a submitted Circular Economy Statement. The Statement sets out an approach to waste reduction based on recognised circular economy principles, including the reuse of existing materials, prioritisation of off-site manufacture, circular and responsible sourcing, and design for longevity and adaptability. It explains how these principles would be applied during construction, identifying materials to be retained, reused or recycled, and includes a number of measurable commitments, particularly in relation to the reuse and recycling of demolition arisings and minimum recycled content within key construction materials such as steel, reinforcement and concrete. However, the Statement does not establish a quantified, scheme-wide circular economy or embodied carbon target, with broader circularity ambitions largely addressed through qualitative design and sourcing commitments. The scope and objectives of the Statement are supported by the County Council and can be secured through an appropriately worded planning condition.

Building for a Healthy Life Assessment

- 6.156 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

- 6.157 The proposed development performs well overall against the BFHL questions. The amber scores relate to a small number of design matters. Under Category 4 (Homes for everyone), two houses and five apartments are proposed to M4(1) standards rather than wheelchair-accessible accommodation. Category 7 (Creating well-defined streets and spaces) reflects limited active frontage to parts of the western block at ground floor level. Category 12 (Back of pavement to front of house) relates to detailed boundary treatments, opportunities to improve access to rear gardens and bin stores, and the scope for further community engagement to inform a public art approach.
- 6.158 Overall, the scheme performs well achieving 9 out of 12 greens. The results of the BFHL assessment are therefore acceptable.

Planning Obligations

- 6.159 Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. These tests are set out as statutory tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and as policy tests in the NPPF.
- 6.160 This report has identified the requirement to secure financial contributions and obligations in accordance with the Heads of Terms table appended to this report.
- 6.161 In support of this application the applicant has submitted a financial viability assessment (FVA) which in part concludes that while the viability constraints affecting the site are such that, in viability terms, there is no scope for any Affordable Housing provision or other S106 contributions from the proposed scheme. The FVA has been reviewed by EDC's consultant expert, and they agree with this conclusion. They advise that the commercial decision whether to proceed with the scheme at risk would be at the discretion of the applicant.
- 6.162 The applicant has agreed the initial Heads of Terms and that these payments and obligations will be secured by a S106 to the land currently owned by the applicant,

prior to the issue of a planning permission. These obligations and contributions have been suitably evidenced and accepted by the applicant.

- 6.163 The draft Heads of Terms are set out in the table appended to this report. KCC have requested financial contributions towards: Primary and Secondary Education; Special Education Needs and Disabilities, Adult Social Care; Integrated Children's Services; Library and Archive Services; Community Learning and Skills; Sports and Leisure; Waste Facilities; Obligation Monitoring fees. Gravesham Borough Council have requested financial contributions for the design, consultation, implementation and enforcement of a Controlled Parking Zone in the vicinity; and, towards the design, consultation and implementation of TRO and highway works within College Road. The Primary Care Trust has requested a financial contribution towards new healthcare provision and infrastructure within 3 miles of the site. Financial contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS) is requested by EDC to mitigate recreational disturbance of the new development. Two non-financial contributions are agreed in relation to the provision of 20no. Affordable Housing units in a Discount Market Sales tenure and to co-operate with the LPA and/or the LHA to facilitate a future footway/cycleway from the EDC land to the west of the site (between Grove Road and the River Thames) to the extended Harbour Village site.
- 6.164 Alongside the obligations and contributions being secured by a S106 to the land currently owned by the applicant, a mechanism for a further legal agreement would then be secured by a pre-commencement planning condition to apply the obligations to the remainder of the site once the applicant takes ownership of the remainder of the site. Once all secured the legal agreements would be enforceable against the land. This is required prior to commencement of development on any part of the site.
- 6.165 In requesting and negotiating the obligations as detailed above as part of this application, EDC is satisfied that they are fair and reasonable and meet the statutory tests in the CIL Regulations (reg 122) and as described in paragraph 58 of the NPPF.

Other Considerations

Environmental Impact Assessment (EIA) -

- 6.166 No request for a formal EIA screening opinion was submitted prior to validation of the planning application. The proposal has therefore been considered against the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as part of the assessment process. The development falls within Schedule 2, Part 10(b) of the Regulations as an urban development project; however, the site area does not exceed the Schedule 3 screening thresholds of either 5 hectares or 150 dwellings. Having regard to the nature, scale and location of the proposal, it is not considered likely to result in significant environmental effects. Consequently, the development is not considered to constitute EIA development and is not required to be accompanied by an Environmental Statement.

Habitats Regulation Assessment -

- 6.167 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.
- 6.168 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.

- 6.169 Following 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. Therefore, EDC as LPA in its role as competent authority has carried out an Appropriate Assessment in order to assess whether any adverse impact on the integrity of the South Thames Estuary and Marshes SPA can be ruled out. The Appropriate Assessment concludes that the provision of a s106 planning obligation is required to provide a financial contribution to the Thames, Medway and Swale Strategic Access Management and Monitoring Strategy equating to £23,810.88 (£350.16 per dwelling) in order to ensure that the proposal will not adversely affect the integrity of the European Sites. The requirements of The Conservation of Habitats and Species Regulations 2017 have been adhered to in this regard.

Marine Plans -

- 6.170 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. 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.
- 6.171 Following assessment and subject to a legal agreement to allow for a future footway/cycleway connection to a future riverside public park to the west of the site, the proposal will not result in any unacceptable impact on the coast, most particularly the following policies apply: 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 legal agreement to allow for a future link to EDC land to the west of the site; 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.
- 6.172 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 so far as material to the application for planning permission. 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 the following benefits to the public purse accrue from development – New Homes Bonus (which is a local finance consideration) and Council Tax for new dwellings.

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 90% 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 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

- 10.2 Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless: (1) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or (2) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 10.3 In the Gravesham context, it is recognised that as the site is not designated and does not engage any of the policies relating to protected areas and assets as set out in footnote 7 of paragraph 12 of the NPPF.
- 10.4 Therefore, in determining this application involving housing, there needs to be applied a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 130(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.
- 10.5 So, in turning to the planning balance of the proposal there needs to be considered the benefits of the proposal and the adverse impacts of the proposal.

Benefits of the scheme

- 10.6 It is accepted that the development will bring with it benefits which are economic, social and environmental.
- 10.7 In social terms the undersupply of housing in the district is substantial and the delivery of 68 new homes would offer a significant positive contribution towards meeting this local housing need.
- 10.8 The inclusion of 20 affordable homes in a Discount Market Sales tenure, whilst not delivering any Affordable Rented units, and as such not being fully compliant with policy, it is considered that the provision of the DMS units should be awarded moderate weight in support of the application.
- 10.9 The securing of policy compliant obligations in all other areas notwithstanding a VIA concluding that any payment of obligations is unviable, is awarded moderate weight in support of the application.
- 10.10 A betterment of the Abacus Corner section of Fastrack, as obligated under the OPP, would be achieved with this proposal allowing for the two-way running of traffic in place of single track running, for what is a piece of strategic sustainable infrastructure within Northfleet. This can also be afforded a moderate weight to this argument in favour of the proposal benefit.

- 10.11 The inclusion within the legal agreement of rights for the delivery of a public footway/cycleway from the application site and OPP site by a third party (likely EDC and KCC) is consistent with key sustainability aspirations of the Development Plan and provides the opportunity for 'betterment' and can be afforded moderate weight in support of this application.
- 10.12 In economic terms there would occur job creation from construction jobs (and apprenticeships) but given the loss of the employment park without replacement and as such limited weight is afforded in this regard.
- 10.13 In environmental terms the removal of unrestricted industrial uses adjacent to the Harbour Village residential properties and replacement with a residential development, forming an extension to the Harbour Village residential development, will likely result in improvements to living condition for neighbouring occupiers. However, given the proximity of the proposed dwellings to the WER unrestricted general industrial use and safeguarded operational wharfs, and the noise mitigation measures required to make the application acceptable in planning terms no weight is afforded in this regard.
- 10.14 The provision of landscaping and public realm are necessary to make the development acceptable in planning terms and otherwise mitigate adverse effects and as such no weight is afforded in this regard.
- 10.15 In environmental terms there would occur a Biodiversity Net Gain exceeding the 10% requirement for the site but the site is not large and as such limited weight can be afforded to this argument in favour of the proposal benefit.

Adverse impacts of scheme

- 10.16 The development will result in adverse impacts which are economic and social.
- 10.17 The loss of existing and unrestricted industrial floorspace, when there is a shortage of such floorspace within the GBC administrative area, is considered to have an adverse economic impact. However, there is no specific policy requirement to retain this particular existing employment park, notwithstanding the Ebbsfleet Implementation Framework desire that such floorspace is retained when possible, and as such a negligible weighting is afforded in this regard.
- 10.18 The loss of the associated industrial jobs with the loss of the employment park is considered to have an adverse social impact of this proposal. However, given that there is no specific policy requirement to retain this particular employment floorspace a negligible weighting is afforded in this regard.
- 10.19 The non-active frontage of most particularly the western apartment block at lower ground floor level onto the public realm (streets) is considered to be disappointing and is avoidable with the introduction of a water-compatible use at this level. The VIA has sighted build costs for a five storey building as being prohibitive to allow for this. As such a moderate weight is afforded for the adverse impact in this regard.

Conflict with the Local Plan

- 10.20 Subject to the suggested conditions within this report and a legal agreement to secure the payments and obligations within the appended table the proposal is not considered to conflict with local policy other than the tenure split of the proposed Affordable Housing provision and a very minor AH provision under the 30% minimum provision.

Summary on the planning balance and conclusion

- 10.21 As previously discussed, in a tilted balance, the cumulative 'adverse impacts' and any significant breaches of local policy and non-conformity with national policy would need to "significantly and demonstrably" outweigh the benefits of the scheme for the balance of the presumption in favour if the development to fail, were the development considered to constitute sustainable development.
- 10.22 In conclusion, it can be seen from the preceding report and balancing exercise above that the development is considered to be in a highly sustainable location and the proposal accords with the development plan subject to conditions and obligations. The benefits of the development are not outweighed "significantly and demonstrably" by the adverse impacts of the development and in the tilted balance there remains the presumption in favour of this sustainable scheme.
- 10.23 Subject to the completion of the deed of planning obligation and conditions as proposed the proposals are considered to broadly accord with the principles and parameters established by the Harbour Village outline planning permission, for which this proposal would be an extension and operated as part of that development and reliant upon it. The proposal would also provide a betterment to the Fastrack section of road over that obligated within the OPP, but the lack of an active frontage of the apartment buildings to the street on the northern and western elevations is unfortunate and will need very careful detailing, further engagement in terms of public art and careful landscaping. Overall, subject to conditions and the legal agreement the proposal would accord with local and national planning policies, and to be broadly aligned with the Ebbsfleet Implementation Framework.
- 10.24 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.
- 10.25 The application is therefore recommended for approval subject to imposition of the planning conditions listed and completion of the deed of planning obligations detailed in the appended Heads of Terms table.

END