

Delegated Report

Planning Application

Planning Application No: 20240438

Location: Northfleet School For Girls Hall Road Northfleet Gravesend

Description: Erection of a single storey modular teaching and drama block.

Applicant: Mr Andy Jarrett, Northfleet School For Girls

Site Visit Date: 16 January 2025

Submitted Documents/Plans

Application for Planning Permission form;
Drawing no. NSFG-BPC-00-XX-D-A-0010 Rev. P02 Existing block plan received 05 February 2025;
Drawing no. NSFG-BPC-00-XX-D-A-0001 Rev. P02 Site location plan;
Drawing no. NSFG-BPC-00-XX-D-A-0052 Rev. P02 Proposed floor and roof plans;
Drawing no. NSFG-BPC-00-XX-D-A-0011 Rev. P02 Proposed block plan 05 February 2025;
Drawing no. NSFG-BPC-00-XX-D-A-0051 Rev. P02 Proposed elevations;
Drawing no. NSFG-BPC-00-XX-D-A-0012 Rev. P03 Proposed site plan;
Letter from the agent dated 10 May 2024;
Biodiversity Net Gain Baseline Plan;
Biodiversity Net Gain (BNG) Proposed Plan;
Biodiversity Net Gain Small sites metric;
Biodiversity Net Gain summary letter dated 25 November 2024;
Email from the agent received 16 January 2025; and
Email from the agent received 28 January 2025.

Superseded Documents/Plans

Drawing no. NSFG-BPC-00-XX-D-A-0010 Rev. P02 Existing block plan received 16 May 2024;
Drawing no. NSFG-BPC-00-XX-D-A-0011 Rev. P02 Proposed block plan received 16 May 2024; and
Drawing no. NSFG-BPC-00-XX-D-A-0012 Rev. P02 Proposed site plan.

Procedural Issues

Following a request from the case officer, the applicant provided clarification regarding the nature of the proposed use (in an email received 16 January 2025) and the fact that no groundworks are proposed to the existing landscaped bunds at the application site (in an email received 28 January 2025). The existing and proposed block plans and the site plan were also amended.

Relevant Planning History

Reference	Description	Decision	Decision Date
20210709	KCC Consultation KCC/GR/0109/2021- Temporary stationing and use of three modular buildings for a period of six months.	No objection	15.06.2021
20191045	KCC Consultation KCC/GR/0176/2019 - Erection of a new two storey teaching block and an activity studio extension	No objection	25.10.2019

	to existing sports block.		
20180597	Prior notification for the proposed installation of 677 x 270w Solar Photovoltaics Panels on the roofs under Schedule 2, Class J, Part 14 of the Town and Country Planning (General Permitted Development) Order 2015.	Prior approval granted	31.08.2018
20160019	Application under Regulation 3 for the re-establishment of school farm to include wildfowl and animals. Inclusion of polytunnel for horticulture. KCC decision 11/2/16	No objection	02.02.2016
20110330	Application under Regulation 3 for first floor extension above existing food technology rooms to provide two additional classrooms. KCC GRANTED PERMISSION 22.6.2011 (CONDITIONS)	No objection	08.06.2011
20110054	Application under Regulation 3 for retention of a mobile classroom unit and alterations to landscaping. KCC GRANTED PERMISSION 7.4.2011 (CONDITIONS)	No objection	02.03.2011
20080827	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the renewal of planning permission for three mobile classrooms. KCC GRANTED TEMPORARY PERMISSION 22.10.08 (CONDITIONS)	No objection	22.10.2008
20080229	Joint application under Regulation 3 of the Town and Country Planning General Regulations 1992 for redevelopment of the school involving the demolition of existing buildings, refurbishment and extension of retained buildings and the construction of new buildings together with revised access arrangements on to Hall Road, new car parking, hard play area, landscaping and the provision of temporary accommodation during construction. KCC GRANTED PERMISSION 4.8.08 (CONDITIONS)	Permitted	04.08.2008

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC7 – Other Archaeological Sites

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core

Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

GBC Environmental Protection Team (Regulatory Services)

Initial response:

It's not clear from the application details the extent of the proposed use. For example will the drama hall be used for pupils shows or activities etc in the evenings or weekends outside of school hours, will there be any community use or private hire use, is it anticipated that the use will include amplified music etc. Can the applicant be asked to provide more information on the indented use including answers to the points raised above.

Modular buildings generally offer little by way of noise insulation and the site is only c.17m from the boundary of the houses in Tennyson Walk and c. 40m to the houses themselves, It will be important to ensure that the new use in this area does not give rise to noise/nuisance problems to the residents.

Second response:

The comments from the applicant's agent helps to clarify the situation. Given the proposed time and type of intended use, and also the reference to the building adhering to BB93 - Acoustic design of schools, there is no objection to this application on noise or other grounds.

GBC Parks and Open Space Manager

Initial response:

Based on the documents included in the application, here are the key points and comments regarding the proposed extension of the school building at Northfleet School for Girls, with a focus on biodiversity net gain (BNG) and ecological considerations:

1. Biodiversity Net Gain (BNG) Assessment

- **Baseline Conditions:** The site currently consists of urban developed land (sealed surfaces), modified grassland, and a few small cherry trees in poor condition. The baseline biodiversity score is 0.6005 habitat units.
- **Proposed Development:** The post-construction site will include new urban developed land (classroom building and paths), species-rich grassland, and four new native trees to replace the loss of one existing tree. The post-development biodiversity score is 0.7031 habitat units.
- **Net Gain:** The proposals result in a 17.09% net gain in habitat units, which exceeds the mandatory 10% BNG requirement under the Environment Act 2021. This satisfies the BNG criteria and demonstrates a positive impact on biodiversity.

2. Ecological Considerations

- Kent County Council (KCC) Ecological Advice Service (EAS) has reviewed the application and confirmed that sufficient ecological information has been provided. They have also noted that the

proposed development meets the mandatory 10% BNG requirement.

- Tree Retention: Four trees will be retained on-site, and new native trees will be planted to offset the loss of one existing tree. This is considered a significant enhancement and should be secured through a Habitat Management and Monitoring Plan (HMMP).
- Species-Rich Grassland: The proposed use of species-rich turf (from Wildflower Turf) is a positive step towards enhancing biodiversity. However, KCC has noted that achieving good condition for other neutral grassland may be challenging given the site's use and location. This will require careful management and monitoring.

3. Mitigation and Monitoring

- Habitat Management and Monitoring Plan (HMMP): KCC recommends that an HMMP be submitted and approved before development commences. This plan should include detailed soft landscaping plans, planting schedules, and management measures to ensure the habitats are maintained for at least 30 years.
- Completion Report: KCC suggests a condition requiring the submission of a completion report with photographic evidence to confirm that habitat creation and enhancement works have been completed as per the HMMP.
- Breeding Birds: KCC has provided an informative reminding the applicant of the legal protections for nesting birds under the Wildlife and Countryside Act 1981. Any vegetation removal should ideally occur outside the bird breeding season (1st March to 31st August), or mitigation measures should be implemented if work is required during this period.

4. Planning Conditions

- Biodiversity Gain Plan: KCC recommends that the Biodiversity Gain Plan be prepared in accordance with the submitted BNG Proposed Plan by Greenlink Ecology Ltd. This ensures that the proposed biodiversity enhancements are implemented as planned.
- Significant Enhancements: The retained and proposed trees, as well as the species-rich grassland, are considered significant enhancements. These should be secured through planning conditions or legal agreements to ensure long-term maintenance.

5. Conclusion

- The proposed development at Northfleet School for Girls demonstrates a 17.09% biodiversity net gain, which exceeds the mandatory 10% requirement. The ecological mitigation measures, including the retention of trees and the creation of species-rich grassland, are appropriate and should be secured through a detailed Habitat Management and Monitoring Plan (HMMP).
- KCC's recommendations for planning conditions and informatives should be incorporated into the decision notice to ensure compliance with biodiversity net gain requirements and ecological protections.

Recommendations:

- Approve the proposed extension, subject to the inclusion of the recommended planning conditions and informatives from KCC, particularly regarding the submission and approval of a Biodiversity Gain Plan and Habitat Management and Monitoring Plan (HMMP).
- Ensure that the species-rich grassland and tree planting are carefully managed and monitored to achieve the proposed biodiversity enhancements – including the appropriate management of the laid turf so that it remains as a featured species-rich turf and doesn't return to a neutral grassland (with zero uplift)
- Adhere to the guidelines for protecting nesting birds during vegetation removal, especially if work is required during the breeding season.

Second response:

I recently visited the site with the tree surgeon to assess the impact of the proposed development on the existing vegetation. After a thorough evaluation, we determined that the three small cherry trees located within the red line boundary do not possess significant biodiversity or habitat value.

While these trees will be in close proximity to the foundation of the new building, we do not anticipate that the construction will disturb the root systems or cause any detrimental harm to the health of the trees.

Furthermore, the proposed mitigation measures, including the removal of grass and the planting of additional standard trees as part of this planning application, appear to be appropriate and sufficient for the

space.

KCC Biodiversity Officer

Initial response (NB summary only, Appendix 1 contains full response):

We have reviewed the information submitted by the applicant and advise that additional information is required prior to determination of the application:

- Confirmation that four of the five trees can be retained on-site;
- Confirmation that mandatory 10% biodiversity net gain applies to this application and that it was submitted on or after 2nd April 2024; and
- A statement whether activities have been carried out prior to the date of the application (or earlier proposed date) that result in loss of onsite biodiversity value as per the table below.

If all trees need to be removed from the site to facilitate the development, it is likely that off-site compensation will be required to achieve a 10% biodiversity net gain.

There appear to be trees near the proposed development. A tree officer can advise with regards to issues pertaining to root protection areas.

Under the National Planning Policy Framework (NPPF) 2024, proposals achieving a biodiversity net gain with no specific percentage target should be viewed favourably¹.

Under the Environment Act 2021, all planning applications for development (unless exempt^{2,3}) must deliver at least a 10% biodiversity net gain. This mandatory 10% biodiversity net gain is provided through the provision of habitats and does not require the provision of habitat features such as bird boxes, bat boxes, hedgehog highways etc. The provision of such habitat features may be required for both mandatory 10% biodiversity net gain exempted and non-exempted developments to meet necessary protected and/or priority species mitigation/compensation, and/or to contribute to biodiversity enhancements⁴ as per the NPPF 2024 and to help meet the public authority biodiversity duty⁵.

We highlight that paragraph 187 of the NPPF 2024 states: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehog..."

Once the further information is received, we can we advise regarding condition/informative wording should planning permission be granted.

Footnotes

¹ Appeal decisions (Planning Inspectorate (2022). Appeal Decisions APP/Y3940/W/21/3278256, APP/Y3940/Q/21/3278923, APP/Y3940/W/21/3282365) have clarified that:

- "Paragraph 174 [now 187] of the Framework [the NPPF encourages applicants to], ... seek a net gain in biodiversity without identifying a specific percentage..."
- The relevant Core Strategy may "...seek a net gain in biodiversity without identifying a specific percentage..."; and
- "A net gain of just 1% would be policy compliant..."

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

⁴ Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation.

⁵ Complying with the biodiversity duty - GOV.UK

Second response (NB summary only, Appendix 2 contains full response):

We have reviewed the additional information submitted by the applicant and advise that sufficient ecological information has been provided.

Under the Environment Act 2021, all planning applications for development (unless exempt ^{1,2}) must deliver at least a 10% biodiversity net gain. This mandatory 10% biodiversity net gain is provided through the provision of habitats and does not require the provision of habitat features such as bird boxes, bat boxes, hedgehog highways etc. The provision of such habitat features may be required to meet necessary protected and/or priority species mitigation/compensation, and/or to contribute to biodiversity enhancements³ as per the NPPF 2024 and to help meet the public authority biodiversity duty⁴.

We highlight that paragraph 187 of the NPPF 2024 states: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehog..."

As such, to meet the necessary policy and legislative requirements, if planning permission is granted, we advise the conditions/informative in Appendix 1 are included.

There appear to be trees near the proposed development. A tree officer can advise with regards to issues pertaining to root protection areas.

Footnotes

¹ Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

² The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

³ Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation.

⁴ Complying with the biodiversity duty - GOV.UK

Kent Police Designing Out Crime Team

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. We recommend the use of the Secured By Design (SBD) principles for this proposal to show commitment to crime prevention and community safety.
2. We strongly recommend external doors and windows meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+.
3. Vehicle mitigation barriers may be required if there are pedestrian footpaths near a road in order to avoid conflict and to safeguard users.
4. The layout of the building must allow visitors access to be restricted to certain areas only preventing any further access. Door access control may be required.
5. From a security and child safety aspect, we recommend that all fire exits are alarmed to alert staff should these be opened.
6. A security alarm system should be installed and utilized when the building is not in use.

7. Landscaping. Trees should be pruned so that they do not provide climbing aids, which may compromise the secure boundary.
8. Lighting. Appropriate lighting will be required. Please refer to the SBD guide.
9. We recommend CCTV coverage of the main entrances/exits and remote areas that tend to be unsupervised due to the lack of natural surveillance.
10. Access control. Adequate access control is required for entrances used by staff only such as any staff rooms, storage rooms and other restricted areas.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

KCC Area Schools Organisation Officer

No response received.

Neighbouring properties

The application was publicised by a site notice and to 22 neighbouring properties by letter. Four representations have been received (three objecting and one neither objecting nor supporting) and are summarised as follows;

- Adverse noise/disturbance impacts of evening and weekend use.
- General adverse noise impacts from increased use of the area by pupils.
- Consider erecting a good quality, higher fence between the residential properties and the school to mitigate noise impacts.
- Adverse overlooking impacts associated with increased footfall where boundary fence provides little screening.
- Adverse overshadowing impacts and loss of natural light.
- Consider erecting privacy panels or a solid fence to mitigate overlooking.
- Adverse light pollution impacts.
- Concerns that the building would be rented out at weekends and during school holidays.
- There would be an increase in pupils using the application site.
- Any development likely to generate additional traffic should not occur until the A226 at Galley Hill is reopened.

Officer's Analysis

Proposal

Planning permission is sought for the erection of a single storey building to be used as a drama space and for two general teaching classrooms. Although the application details suggest that the building would not be used outside of normal school hours, the applicant (at the site visit) stated that the proposed building may be used as out of hours practice space but not as performance space and that there would be no amplified music. It is on that basis that the application has been assessed.

The proposed building would have a floor area of 288 square metres and a maximum height of 3.2 metres. It would be timber clad with a shallow, mono pitched, anthracite coloured, metal roof and be located to the south west of the main school building.

As a result of the proposal, one existing tree would be removed but four other existing trees would be retained. In addition, four new trees would be planted to the north west of the proposed building and two areas of biodiverse turf would be planted to the north east and east of the proposed building.

The originally submitted details included the undertaking of groundworks to existing bunds located adjacent to the proposed building. However, the applicant has since confirmed that no alterations to the existing bunds would occur and that any spoil resulting from the construction works would be disposed of off-site.

There would be no alteration to the existing number of students or staff as a result of the proposed development.

Principle of the Development

Paragraph 100 of the National Planning Policy Framework 2024 (NPPF 2024) requires a proactive, positive and collaborative approach to be undertaken to the provision of a sufficient choice of early years, school and post-16 places. In this regard, great weight should be given to the need to create, expand or alter such facilities in local plans and in the determination of planning applications.

Policy CS10 of the Gravesham Local Plan Core Strategy (2014) states that support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure or lead to the provision of additional infrastructure that improves community well-being.

The proposed development would improve the teaching facilities at an existing secondary school and as such, would be acceptable in principle and in line with paragraph 100 of the NPPF 2024 and Policy CS10 of the Gravesham Local Plan Core Strategy (2014).

Design, Character and Appearance

The proposed building would be substantial in size and would result in the loss of an area of open, grassed land at the application site. However, in the context of the built development as a whole, the building would be subservient in both size and scale and would be softened by proposed planting.

The proposed external facing materials (timber effect cladding, with anthracite coloured metal roof) would not be in keeping with the main school building (which has facing bricks and coloured cladding) but it would match with an existing detached building located immediately to the south west.

Overall, the proposed development would not result in an overdevelopment of the school site, nor would it look out of place within its context. As such, there would be no adverse impacts to the character or appearance of the application site or the surrounding area and the proposal would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The closest residential properties to the application site are nos. 25 to 37 Tennyson Walk (located to the south east). Nos. 107 to 129 Hall Road are located to the north across the roadway from the entrance to the school's western parking area.

Local residents have raised concerns regarding;

- Adverse noise/disturbance impacts of any proposed evening and weekend use and adverse noise impacts from increased use of the area by pupils.
- Adverse overlooking impacts associated with increased footfall
- Adverse overshadowing impacts and loss of natural light.
- Adverse light pollution impacts.

The proposed development has the potential to cause adverse noise/disturbance impacts to the occupiers of surrounding residential properties in Tennyson Walk, from additional pupil/staff movements and from the proposed drama teaching use, for example from amplified music and/or out of hours operations.

It is noted that the applicant has set out that the building may be used outside of normal school hours but that there would be no amplified music or performances. Furthermore, it is noted that the building would be constructed to comply with the acoustic performance standards for new school buildings.

The application site is already used by students and teachers to access other classrooms/areas of the school and any increase in pupil/staff movements would not result in any significant increase above existing levels of noise/disturbance in this location.

The GBC Environmental Protection Team (Regulatory Services) raise no objection to the proposal in terms of adverse noise impacts and welcome the reference to the building's construction being in accordance with acoustic performance standards. Conditions can be attached to any planning permission granted to ensure that the construction meets the required acoustic standards and that amplified music is precluded from being played.

In terms of potential adverse overlooking impacts, whilst some mature planting is located on the site boundary, gaps in this planting does allow some views towards the properties in Tennyson Walk. The closest dwelling to the proposed building would be no. 27 Tennyson Walk, which is located some 35 metres to the south (i.e. in excess of the minimum privacy distance of 26 metres). Furthermore, the windows in the rear elevation of the proposed building would have cill heights of some 1.8 metres and as such, would be high level and would not allow any overlooking towards the residential properties located in Tennyson Walk.

There is an existing path which runs alongside the site boundary with Tennyson Walk, which would be retained (with a small alteration at the southern end of the proposed building – moving the path closer to the boundary by some two metres). This path is already used by students and teachers to access other classrooms/areas of the school and it is considered that any increase in pupil/staff movements and the proposed realignment associated with this proposal, would not result in any significant increase above existing levels of overlooking in this location.

Due to the design of the proposed development and to the layout and orientation of the surrounding properties, there would be no loss of natural light or any adverse overshadowing or overbearing impacts to the occupiers of the surrounding dwellings.

The application details do not propose the installation of any external lighting and a condition can be attached to any planning permission granted to ensure that this is precluded from being added to the building in future, unless specific details are submitted for approval.

Overall, it is considered that subject to conditions, the proposed development would have no significant adverse impacts on the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Parking and Highways

The proposed development would not affect the existing access or vehicle parking layout for the wider school site and there would be no increase in staff or pupil numbers. As such, the proposal would have no adverse impacts on highway safety or vehicle parking provision and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994).

Ecology and Biodiversity

Paragraph 193(a) of the NPPF 2024 states that, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Paragraph 193(d) of the NPPF 2024 states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Policy CS12 of the Gravesham Local Plan Core Strategy (2014) states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within Biodiversity Opportunity Areas and within new development.

In addition, under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG). Where BNG is required, the Defra Statutory Metric must be used to demonstrate that a minimum 10% biodiversity net gain can be achieved and the habitats created/enhanced to achieve BNG must be secured for at least 30 years.

In this instance, the proposed development is not exempt from BNG and the application details show that a BNG of some 17% would be achieved on site. The BNG would be achieved by the planting of four new native trees (to off-set the removal of one existing cherry tree) and two areas of biodiverse turf (to off-set the removal of an area of species poor existing grassland).

The KCC Biodiversity Officer does not raise an objection to the proposal on biodiversity grounds, has accepted that the BNG information submitted is sufficient and suggests various conditions and informatives. She also highlights the need to consider the impacts to trees located in close proximity to the proposed building.

The GBC Service Manager (Housing Operations) does not raise an objection to the proposal and has set out that the proposed works would not have any adverse impacts to existing trees at the application site.

It is noted that the applicant has agreed to the imposition of a pre-commencement condition in relation to the submission and approval of a habitat management and monitoring plan.

Subject to conditions/informatives, the proposed development would improve biodiversity at the application site and would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and paragraphs 193(a) and 193(d) of the NPPF 2024.

Any Other Material Planning Considerations

The application site is located within an area of multi-period archaeological potential and Groundwater Source Protection Zone 2. However, as the proposed development is within the confines of an existing school site and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to groundwater or archaeology. As such, the proposal would be in line with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located in a smoke control area. As such, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted.

Local residents have raised a number of concerns, the majority of which have been covered in the above discussion. The outstanding issues are summarised and commented on (in italics) as follows;

- Consider erecting privacy panels or a good quality, higher fence between the residential properties and the school to mitigate noise and overlooking impacts – *as there would be no significant adverse noise/overlooking impacts, there would be no justification for requesting these.*
- Any development likely to generate additional traffic should not occur until the A226 at Galley Hill is reopened – *the proposal would not generate additional vehicle movements.*

The comments of the Kent Police Designing Out Crime Team can be brought to the attention of the applicant in an informative attached to any planning permission granted.

Suggested conditions

Time Limit

Development in accordance with the approved plans

Pre-commencement submission and approval of habitat management and monitoring plan

Biodiversity Gain Plan

Construction to meet acoustic standards

No amplified music

No external lighting

Notice and evidence of completion of habitat creation/enhancement works

Suggested informatives

Biodiversity Net Gain

Positive/proactive

Building Regulations and Party Wall Act

Deviation from the approved plans

Kent Police Designing Out Crime comments

Breeding birds

Smoke control

Agreement to pre-commencement condition

Works of construction

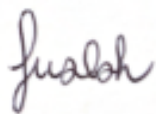
Conclusion

The proposal would comply with local and national planning policies and subject to the conditions set out above, the proposal would be acceptable.

Recommendation

Planning permission subject to conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	26th February 2025	Dated:	28 February 2025