

Delegated Report

Kent County Council Consultation Application

Planning Application No: 20230164

Location: Gravesend Grammar School For Boys Church Walk Gravesend Kent

Description: KCC Consultation - Details of the temporary teaching accommodation (Condition 3), details of a School Travel Plan (Condition 21) and details of a Verification Report pertaining to the surface water drainage system (Condition 22) pursuant to planning permission GR/21/0823

Applicant: Kent County Council

Kent County Council (KCC), as the determining Planning Authority, has consulted Gravesham Borough Council (GBC) for its views on the details submitted pursuant to Condition 3 (details of the temporary teaching accommodation), Condition 21 (details of a School Travel Plan) and Condition 22 (details of a Verification Report pertaining to the surface water drainage system) attached to planning permission reference GR/21/0823 (GBC Ref. 20210823).

Relevant Planning History

Reference	Description	Decision	Decision Date
20210823	KCC Consultation KCC/GR/0133/2021 - Proposed expansion from 6FE to 7FE, to include the construction of a new two storey teaching building, and external works to provide a new drop-off circuit and set-down area, relocated parking to the north of the site and removal of the existing mobile classrooms.	Observations Sent	09.09.2021

Consultation

GBC – Highways Officer

01.03.23

I consider the submission confusing, Condition 21 requires a Travel Plan to be submitted, yet all that appears to have been submitted is an annual review of a previous Travel Plan, which if my understanding is correct does not comply with the condition.

Condition

School Travel Plan

21. Prior to the first use/occupation of the development hereby permitted an updated School Travel Plan shall be submitted for the written approval of the County Planning Authority via the County Council's online Travel Plan system 'Jambusters'. The updated Travel Plan shall include measures to encourage and promote sustainable transport options, including the possibility of signing up to the County Council's Responsible Parking initiative and shall set out SMART targets (specific, measurable, achievable, realistic and timely), amongst other matters. The Travel Plan must thereafter be implemented as approved and subject to ongoing monitoring and review.

Reason: In order to encourage safer and more sustainable patterns of school travel.

Submission

We confirm that Gravesend Grammar School have advised that they have submitted their Travel Plan and had confirmation from the KCC Transport Planner as follows:



Yours sincerely

For and on behalf of Baxall Construction Ltd

I do not believe the applicant has complied with the condition.

In terms of the drainage

Looking at the information supplied, the construction of the SUD's system conforms to expectations, the only way to determine if it will work is by a physical test. Ground conditions and in particular soakage rates can vary considerably even in chalk so a test is the only absolute way of confirming the installation will work as expected. A test would involve pouring/spraying water over the paved area at a known rate from a tanker for a specified time. I do not see this submission as complying with the requirements of the condition.

Drainage condition

22. Prior to the first use/occupation of the development hereby permitted, a Verification Report pertaining to the surface water drainage system, carried out by a suitably qualified professional, shall be submitted to and approved in writing by the County Planning Authority, which must demonstrate the suitable modelled operation of the drainage system such that flood risk is appropriately managed. 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.

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

The document supplied does not demonstrate that the flood risk is managed, nor does it provide the as built drawings requested or the maintenance manual.

Following the above consultation response, a School Travel Plan draft 3 – March 2023 was submitted to the determining authority on 14th March 2023. The GBC – Highways Officer provided the following comments;

26.03.23

Having looked at the Travel Plan, I must admit to being disappointed with the submission. There appears to be an emphasis on travel to and from the school by car and the problems this creates on the surrounding streets, rather than positive measures the school should be promoting to encourage car free travel.

The Travel Plan states the existing cycle parking facility is near capacity but makes no reference to increasing its size, or ensuring there is adequate storage for wet weather gear etc..

The School is also close to St John's Roman Catholic School and a combined approach may achieve benefits that may not be possible with each school operating independently.

Sixth formers should be actively discouraged from driving to school, this sets a bad example for younger students and creates on street parking issues. If it must occur, then car sharing should be encouraged. (the same applies to staff) The school should consider approaching KCC Highways with a view to having a one hour waiting restriction imposed on surrounding streets to deter all day parking and so preventing sixth formers from parking on street near the school.

Demand for dedicated school buses should be surveyed annually including students that will be joining the school in September for the first time and suitable contracts entered into to provide an adequate service with appropriately sized vehicles. This should include St John's school to ensure economies of scale.

School should arrange cycle proficiency to encourage cycling and work with KCC Highways to identify popular routes to school that could possibly be improved. Again, working with St John's school may reap benefits, particularly if cycle parking can be shared between the schools to avoid the need to cycle along some parts of the highway network.

With regards to the Transport Statement this appears to primarily be a matter of fact and does not require comment.

Officer's Analysis

The relevant conditions attached to **GR/21/0823** (GBC Ref. **20210823**) are:

Removal of Temporary Teaching Accommodation

3. *The temporary teaching accommodation on site shall be removed within 1 month of the first use/occupation of the permanent teaching accommodation hereby permitted, or upon expiration of their temporary planning consent, whichever is sooner, unless otherwise approved in writing by the County Planning Authority.*

Reason: In order to control the development.

School Travel Plan

21. *Prior to the first use/occupation of the development hereby permitted an updated School Travel Plan shall be submitted for the written approval of the County Planning Authority via the County Council's online Travel Plan system 'Jambusters'. The updated Travel Plan shall include measures to*

encourage and promote sustainable transport options, including the possibility of signing up to the County Council's Responsible Parking initiative and shall set out SMART targets (specific, measurable, achievable, realistic and timely), amongst other matters. The Travel Plan must thereafter be implemented as approved and subject to ongoing monitoring and review.

Reason: In order to encourage safer and more sustainable patterns of school travel.

Drainage

22. *Prior to the first use/occupation of the development hereby permitted, a Verification Report pertaining to the surface water drainage system, carried out by a suitably qualified professional, shall be submitted to and approved in writing by the County Planning Authority, which must demonstrate the suitable modelled operation of the drainage system such that flood risk is appropriately managed. 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.*

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

The following details have been provided to KCC (the determining authority) (see below):

Application Documents	Created Date
☐ Application Form - Redacted (192 kb)	06/02/2023
☐ Agent's Covering Letter - Condition 3 - Redacted (563 kb)	06/02/2023
☐ Agent's Covering Letter - Condition 21 - Redacted (231 kb)	06/02/2023
☐ Drainage Verification Report (907 kb)	06/02/2023
☐ School Travel Plan - Annual Review - Redacted (51 kb)	21/02/2023
☐ School Travel Plan draft 3 – March 2023 (12051 kb)	14/03/2023
☐ Transport Statement – Gravesend Grammar School - Redacted (7072 kb)	14/03/2023

Condition 3 – Removal of Temporary Teaching Accommodation

In relation to Condition 3, it has been confirmed in writing and photographs that the temporary teaching building has been removed from the site and therefore sufficient details have been submitted to satisfy Condition 3 of GR/21/0823 and The Borough Council raises no objection to the discharge of Condition 3.

Condition 21 – Details of a School Travel Plan

Condition 21 the submitted Travel Plan appears to have an emphasis on travel to and from the school by car and the problems this creates on the surrounding streets, rather than positive measures the school should be promoting to encourage car free travel.

The Travel Plan states the existing cycle parking facility is near capacity but makes no reference to increasing its size, or ensuring there is adequate storage for wet weather gear etc.

The School is also close to St John's Roman Catholic School and a combined approach may achieve benefits that may not be possible with each school operating independently.

Sixth formers should be actively discouraged from driving to school, this sets a bad example for younger students and creates on street parking issues. If it must occur, then car sharing should be encouraged. (the same applies to staff). The school should consider approaching KCC Highways with a view to having a one hour waiting restriction imposed on surrounding streets to deter all day parking and so preventing sixth formers from parking on street near the school.

Demand for dedicated school buses should be surveyed annually including students that will be joining the school in September for the first time and suitable contracts entered into to provide an adequate service with appropriately sized vehicles. This should include St John's school to ensure economies of scale.

School should arrange cycle proficiency to encourage cycling and work with KCC Highways to identify popular routes to school that could possibly be improved. Again, working with St John's school may reap benefits, particularly if cycle parking can be shared between the schools to avoid the need to cycle along some parts of the highway network.

With regards to the Transport Statement this appears to primarily be a matter of fact and does not require comment.

Therefore whilst there has been an updated travel plan submitted, it is not considered to encourage sustainable transport options, but instead relies on travel to and from school by car. As such, The Borough Council considers that the submitted Travel Plan is inadequate and not sufficient to Discharge Condition 21 of GR/21/0823.

Condition 22 – Drainage

The document supplied does not demonstrate that the flood risk is managed, nor does it provide the as built drawings requested or the maintenance manual.

The Borough Council therefore considers this to be insufficient to Discharge Condition 22 of GR/21/0823.

The Borough Council raises no objection to the details provided to discharge Condition 3 attached to planning application GR/21/0823 (GBC Ref. 20210823), however The Borough Council consider that there has been inadequate and insufficient details and information submitted to satisfy the requirements of Conditions 21 and 22 attached to planning application GR/21/0823 (GBC Ref. 20210823), and therefore raise objections to this application.

Conclusion

Gravesham Borough Council consider that the submitted details in respect of Conditions 21 and 22 attached to planning application GR/21/0823 (GBC Ref. 20210823), are insufficient to discharge the conditions and therefore raise objections to this application.

Recommendation

Objection

See draft Decision

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Amanda Grout	Team Leader:	
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Signed:	<i>A Grout</i>	Signed:	
Dated:	28 th March 2023	Dated:	