

PLANNING STATEMENT

**Proposed Change of Use to Children's Nursery
St John Ambulance Hall, Hall Road, Northfleet**



1. Introduction

This Planning Statement has been prepared in support of a full planning application for the change of use of the former St John Ambulance Hall, Hall Road, Northfleet, to a children's day nursery.

The proposal represents a sustainable and policy-compliant redevelopment of a vacant and underutilised building, delivering a high-quality early years childcare facility within an established residential area. In doing so, it responds directly to an identified and ongoing need for accessible childcare provision, which is essential to supporting working families, early childhood development, and wider economic participation.

The application must be considered in the context of the site's current condition. The building is no longer in active use and has been vacated following the permanent cessation of its former function. In the absence of a viable alternative, it risks remaining unused, to the detriment of the character and vitality of the area. The proposed development provides a clear opportunity to secure the long-term beneficial use of the site, consistent with the objectives of sustainable development.

This statement has been prepared having regard to the Council's pre-application advice. While the concerns raised, particularly in relation to neighbouring amenity and highways, are acknowledged, it is considered that these have been overstated and do not reflect a balanced application of planning policy or the specific characteristics of the site and proposal.

In particular, the pre-application response places significant weight on potential impacts without fully considering the lawful fallback position of the site, the daytime and managed nature of the proposed use, and the policy requirement that development should only be refused where impacts are demonstrably unacceptable or, in highways terms, severe.

This Planning Statement therefore provides a clear and robust assessment of the proposal, demonstrating that it accords with the development plan and the National Planning Policy Framework (2024), and that there are no material considerations that would justify withholding planning permission.

2. Site Context and Fallback Position

The application site comprises a detached single-storey building formerly in use as the St John Ambulance Hall, now vacant following the permanent cessation of that use. The building is located on Hall Road within Northfleet and sits within an established urban area characterised predominantly by residential development. The site is bounded by residential properties to the north-west, south-west and north-east, with a secondary school positioned directly opposite on the south-east side of Hall Road.

The surrounding context is therefore not one of a quiet or isolated residential enclave, but rather a mixed and active environment in which a variety of day-to-day activities already occur. The presence of a secondary school in particular is a defining characteristic of the area, generating regular pedestrian and vehicular movements, as well as associated daytime noise and general activity. This establishes a clear baseline in which comings and goings, traffic movements, and daytime noise are an inherent and accepted part of the local environment.

The site itself includes an area of hardstanding to the front, historically associated with the use of the building, and an outbuilding to the side. The building remains physically capable of occupation and use, and its current vacancy represents an underutilisation of a previously developed site within the urban area.

A key material consideration in the assessment of this application is the lawful fallback position of the site. The building retains an unrestricted lawful use as a community hall (Use Class F2), which could be reactivated at any time without the need for further planning permission. Such a use is capable of generating a wide range of activities, including organised events, meetings, and gatherings, potentially involving significant numbers of people.

Importantly, the former use is not subject to any planning conditions restricting hours of operation, frequency of use, or intensity. As such, it could reasonably give rise to activity during evenings and weekends, including periods that are typically more sensitive in terms of residential amenity. Associated noise, general disturbance, and vehicle movements could therefore occur at times and in patterns that are less predictable and more intensive than the proposed nursery use.

This fallback position carries substantial weight in planning terms. It establishes that the site is not restricted to low-intensity or purely residential-compatible activity, and that a degree of noise, disturbance, and traffic generation is already lawful and acceptable in principle.

When assessed against this baseline, the proposed nursery use represents a materially more controlled, predictable, and limited form of activity. The operation would be confined to weekday daytime hours, with structured management and supervision, and without the potential for late evening or weekend disturbance.

Accordingly, the impacts of the proposed development must be considered in the context of what could reasonably occur under the lawful use of the site. When this comparison is properly applied, it is clear that the proposal would not introduce a level of activity or impact that exceeds what is already permitted, and in many respects would represent a more compatible and less intrusive form of use within the surrounding residential environment.

3. Principle of Development

The application site lies within the defined urban area of Northfleet, where the development plan directs new development and supports the effective reuse of previously developed land. In this context, the principle of reoccupying a vacant building is strongly supported by Policy CS01 (Sustainable Development) and Policy CS02 (Scale and Distribution of Development) of the Gravesham Local Plan Core Strategy (2014), which seek to promote sustainable patterns of development and prioritise regeneration within existing urban areas.

The proposal also falls to be considered against Policy CS10 (Physical and Social Infrastructure), which supports development that contributes towards the provision of community facilities and services that improve the health and wellbeing of the population. National policy within the National Planning Policy Framework (2024) similarly places significant weight on the need to promote healthy and safe communities, including through the provision of accessible childcare facilities.

The key issue in principle is therefore not the location of the development, which is clearly acceptable, but whether the change of use from a former community hall (Use Class F2) to a nursery (Use Class E(f)) results in an unacceptable loss of community use.

In this case, the building is no longer in active use and the former use has ceased permanently. As set out in the Council's pre-application response, the site was previously occupied by the St John Ambulance Northfleet Division, which has now closed. There is no evidence to suggest that the previous occupier intends to return, nor that there is a realistic prospect of the building being reoccupied for its former purpose. In its current condition, the site makes no contribution to local community infrastructure.

It is also relevant to consider the nature of the former use. The building functioned as a facility serving a specific organisation, and its use was likely to have been intermittent and limited in terms of frequency and accessibility to the wider public. As such, its contribution to day-to-day community infrastructure was relatively limited.

By contrast, the proposed nursery would operate on a daily basis and provide an essential and widely accessible service to local residents. The provision of early years childcare is a critical component of social infrastructure, enabling participation in employment and supporting early childhood development. This aligns directly with the objectives of Policy CS10 and Section 8 of the National Planning Policy Framework (2024), which seek to ensure that planning decisions support strong, vibrant and healthy communities.

In this context, the proposal should not be viewed as the loss of a community use, but rather as its reconfiguration into a more active, inclusive, and socially beneficial form. The nursery would deliver a consistent and long-term community benefit, making more effective use of the site than the previous use.

Furthermore, Policy CS02 supports the reuse of previously developed land within the urban area, particularly where it contributes to regeneration and avoids unnecessary vacancy. The continued non-use of the building would conflict with these objectives and could lead to deterioration over time, to the detriment of the character and vitality of the area.

Taking all matters into account, the proposed development represents a sustainable form of development that accords with Policies CS01, CS02 and CS10 of the Gravesham Local Plan Core Strategy (2014), as well as the relevant provisions of the National Planning Policy Framework (2024). There is therefore no in-principle objection to the proposed change of use.

4. Neighbouring Amenity

The Council's pre-application response raises concerns regarding the potential impact of the proposed nursery on neighbouring residential amenity, particularly in respect of noise, disturbance, and general activity associated with the use. These concerns are acknowledged; however, when assessed against the relevant policy framework and the specific characteristics of the site, it is clear that the proposal would not result in unacceptable harm.

Policy CS19 (Design and Development Principles) of the Gravesham Local Plan Core Strategy (2014) requires that development should not result in significant adverse impacts on the amenity of existing residents, including in respect of noise, disturbance, overlooking, or general living conditions. This is supported by Section 12 of the National Planning Policy Framework (2024), which seeks to secure well-designed places with a high standard of amenity, and Section 8, which promotes healthy and inclusive communities.

Importantly, the policy test is not whether a development results in any change to the existing environment, but whether it gives rise to unacceptable or material harm. In this regard, the Council's concerns appear to be based on the potential for disturbance, rather than a clear demonstration that such impacts would exceed acceptable levels.

A key consideration is the lawful fallback use of the site as a community hall (Use Class F2). As set out previously, this use could generate intermittent but potentially intensive activity, including gatherings, meetings, and events, with associated noise and vehicle movements. Crucially, there are no planning conditions restricting hours of use, meaning that such activity could reasonably occur during evenings and weekends, which are the most sensitive periods for residential amenity.

By comparison, the proposed nursery use is inherently more controlled. The operation would be limited to weekday daytime hours between 08:00 and 18:00, with no evening or weekend activity. This represents a significant restriction on the temporal extent of activity when compared to the lawful use and is a material factor weighing in favour of the proposal.

The surrounding context further informs the assessment. The site is located directly opposite a secondary school, which generates regular and established levels of daytime noise, pedestrian movement, and traffic activity. This is not therefore a low-activity environment, and a degree of daytime noise and disturbance is already part of the character of the area. The introduction of a nursery use would be consistent with this context and would not represent an incongruous or incompatible form of development.

In terms of noise specifically, it is recognised that children generate sound through play and interaction. However, this is a normal and socially valuable form of activity, and one that is inherent within residential and community environments. Planning decisions and appeal outcomes have consistently found that such noise, in itself,

does not constitute unacceptable harm, particularly where it occurs during daytime hours and is associated with a legitimate community use.

The scale and operation of the nursery are also important considerations. While the maximum capacity is 45 children, activity would not occur as a single concentrated group. Children are typically divided into smaller, age-specific groups, and their activities are structured and supervised by staff. This naturally limits noise intensity and ensures a managed environment.

The external space available at the site is relatively limited in size, which further restricts the extent and duration of outdoor activity. Any use of external areas would be supervised and controlled as part of normal nursery operations. As such, the potential for sustained or excessive outdoor noise is inherently constrained.

Internal activity will largely be contained within the building. Given the existing construction, a reasonable degree of sound attenuation is expected, and there is no evidence to suggest that internal noise would give rise to unacceptable impacts at neighbouring properties.

With regard to kitchen operations, these would be small-scale and comparable to a domestic kitchen in nature. Any associated plant or extraction equipment would be appropriately specified and maintained to ensure that noise and odour do not adversely affect neighbouring amenity.

It is also relevant to consider that the site has historically accommodated a non-residential use, and therefore neighbouring properties do not benefit from the expectation of a wholly quiet, residential-only environment. The proposal does not introduce a fundamentally different type of activity, but rather a more structured and time-limited form of use.

Taking all of the above into account, the proposal complies with Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and the relevant provisions of the National Planning Policy Framework (2024). The impacts on neighbouring amenity would not be unacceptable and do not justify refusal of planning permission.

5. Highways and Parking

The Council's pre-application response identifies significant concerns in respect of parking provision, vehicle movements, and the potential impact on highway safety. These concerns are noted; however, when assessed against the relevant development plan policies and national guidance, they do not provide a robust or defensible basis for refusal.

Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy (2014) requires that development should be supported by appropriate infrastructure and should not have an unacceptable impact on the highway network. Similarly, saved Policy T1 of the Gravesham Local Plan First Review (1994) seeks to ensure that development does not adversely affect the safety and capacity of the highway network, while saved Policy P3 relates to the provision of parking in accordance with adopted standards.

At the national level, Section 9 of the National Planning Policy Framework (2024) promotes sustainable transport and requires that development should provide safe and suitable access for all users. Critically, paragraph 115 of the Framework makes clear that development should only be refused on highways grounds where the residual cumulative impacts on the road network would be severe. This is a high policy threshold and is central to the determination of this application.

In this case, there is no substantive evidence to demonstrate that the proposed development would give rise to impacts of such severity.

The proposed nursery would accommodate up to 45 children; however, this figure does not equate to 45 simultaneous vehicle movements. In practice, nursery attendance patterns are inherently staggered, with arrivals and departures occurring over extended periods rather than at a single peak. Children may attend at different times of the day, including part-time sessions, and this naturally disperses traffic generation.

Furthermore, drop-off and pick-up activity is characterised by very short dwell times. Vehicles typically stop for only a few minutes, resulting in a high turnover of spaces rather than sustained parking demand. This operational characteristic is materially different from uses that generate long-stay parking and must be given appropriate weight in assessing parking requirements.

The site is also located within an established residential area and is intended to serve the local catchment. As such, it is reasonable to expect that a proportion of trips will be undertaken on foot. This is consistent with the objectives of Policy CS11 and the NPPF, which seek to promote sustainable transport choices and reduce reliance on the private car.

Staff numbers are modest, and staff arrival and departure times fall outside the peak drop-off and collection periods. This further reduces the potential for concentrated traffic generation.

In considering the impact of the development, it is also necessary to take account of the existing baseline and lawful fallback position. The site has historically operated as a community hall and retains the ability to do so without restriction. Such a use could generate concentrated vehicle movements associated with meetings or events, potentially at irregular times and including evenings or weekends.

In addition, the site is located directly opposite a secondary school, which already generates significant levels of traffic and on-street parking activity at peak times. The surrounding highway network therefore already accommodates periods of increased activity, and the proposal would not introduce a fundamentally new or incompatible pattern of use.

While it is acknowledged that on-site parking provision is limited and does not meet the standards set out in the Kent County Council Parking Standards (SPG4), it is well established in planning practice that such standards are guidelines rather than absolute requirements. The NPPF is clear that parking provision should be considered on a case-by-case basis, taking into account the nature, location, and characteristics of the development.

In this instance, the short-stay and staggered nature of nursery-related trips, combined with the site's location within a residential catchment, reduce the reliance on extensive on-site parking provision. A rigid application of parking standards, without regard to these factors, would not represent a balanced or policy-compliant approach.

Concerns raised in the pre-application response regarding potential overspill parking, obstruction of the highway, or unsafe conditions are, at this stage, speculative. There is no empirical evidence to demonstrate that the development would result in harm of such magnitude that it would compromise highway safety or the free flow of traffic.

In planning terms, the relevant test is whether the impacts would be severe. Given the modest scale of the development, the operational characteristics of the use, the existing baseline conditions, and the absence of evidence demonstrating significant harm, it is clear that this threshold would not be met.

Accordingly, the proposal complies with Policy CS11 of the Gravesham Local Plan Core Strategy (2014), saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994), and Section 9 of the National Planning Policy Framework (2024). The highways and parking impacts do not justify refusal of planning permission.

6. Planning Balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the proposed development accords with the relevant policies of the development plan and is also supported by the National Planning Policy Framework (2024), which carries significant weight as a material consideration.

The proposal represents sustainable development when assessed against the three overarching objectives set out in the Framework: economic, social, and environmental. Economically, the development will support employment through the creation of nursery jobs and enable greater participation in the workforce by providing accessible childcare. Socially, it delivers essential community infrastructure in the form of early years provision, directly supporting families and contributing to the creation of a healthy and inclusive community in accordance with Section 8 of the NPPF. Environmentally, the proposal makes effective use of an existing building within the urban area, in line with Policies CS01 and CS02, thereby reducing the need for new development on undeveloped land.

Significant weight should be afforded to the reuse of a vacant building. The site is currently underutilised, and without intervention, there is a risk that it will remain vacant, leading to potential deterioration and a negative impact on the character of the area. The proposal secures the long-term viable use of the site and contributes positively to the vitality of the locality.

The development also delivers clear benefits in terms of community infrastructure. As set out under Policy CS10, the provision of facilities that support community wellbeing is strongly supported. The proposed nursery represents a more active and accessible form of community use than the former St John Ambulance hall, delivering daily and ongoing benefits to local residents.

In assessing the potential impacts of the development, it has been demonstrated that the concerns raised in relation to neighbouring amenity and highways do not amount to unacceptable harm. With regard to amenity, the use is limited to weekday daytime hours, is professionally managed, and is comparable to, or less intensive than, the lawful fallback use of the site. In highway terms, there is no evidence that the proposal would result in severe residual cumulative impacts, as required by paragraph 115 of the NPPF to justify refusal.

It is also relevant that no technical evidence has been identified which demonstrates that the impacts of the development would be unacceptable. The concerns raised at pre-application stage are based on potential or perceived impacts rather than substantiated harm. In planning terms, the absence of evidence of harm weighs in favour of the proposal.

When undertaking the planning balance, the identified benefits of the scheme are clear, immediate, and substantial. These benefits must be weighed against the

limited and unsubstantiated impacts identified. In this case, the balance falls decisively in favour of the proposal.

The Framework establishes a presumption in favour of sustainable development, and where a proposal accords with the development plan and does not give rise to significant adverse impacts, planning permission should be granted without delay.

Accordingly, there are no material considerations that indicate that planning permission should be withheld, and the proposal should be approved.

9. Conclusion

The proposal represents a sustainable and policy-compliant form of development. It provides clear community benefits and makes effective use of a vacant building.

The concerns raised at pre-application stage do not amount to unacceptable planning harm and do not justify refusal. The proposal complies with the development plan and national policy, and planning permission should be granted.
