



Delegated Report

Planning Application and Listed Building Consent

Planning Application No: 20230196 – Planning Application
20230197 – Listed Building Consent

Location: Bronte School, 7 Pelham Road Gravesend Kent

Description: 20230196 - Change of use of part of existing school car park into a new sports/play area.

20230197 - Application for Listed Building Consent for the change of use of part of existing school car park into a new sports/play area.

Applicant: Mr Nicholas Clements, Bronte School And Nursery Ltd

Site Visit Date: 20th March 2023

Submitted Documents/Plans

Planning Application Form;
Design & Access Statement – Revised B – 24th April 2023;
Heritage Statement;
Photographs;
Site Location Plan;
Existing Block Plan;
Drawing No. 001 Rev B – Existing General Arrangement Plan;
Drawing No. 002 Rev B – Proposed General Arrangement Plan;
Drawing No. 003 Rev A – Proposed Section Through Planter; and
Drawing No. S22/8917/01 – Topographical Survey.

~~Design & Access Statement received 8th March 2023.~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20120432	Application for Listed Building Consent for the erection of three storey and two storey rear extensions to provide disabled access lift, with store at lower ground floor level; sick room, kitchenette and disabled wc at ground floor level; disabled shower room at first floor level and disabled wc and cloakroom at second floor level.	Withdrawn	16.10.2012
20120431	Erection of three storey and two storey rear extensions to provide a disabled access lift, with store at lower ground floor level, sick room. kitchenette and disabled wc at ground floor level; disabled shower room at first floor level and disabled wc and cloakroom at second floor level.	Withdrawn	16.10.2012

20050504	Application for Listed Building Consent for internal and external alterations in connection with the erection of a four storey rear extension to form caretaker's workshop at lower ground floor level, enlarged cloakroom and visitor's room at ground floor level with two classrooms at first and second floor levels; erection of a separate four storey rear extension to form disabled lift with kitchenette and wc at ground floor level.	Permission	12.08.2005
20050503	Erection of four storey rear extension to form caretaker's workshop at lower ground floor level; enlarged cloakroom and visitor's room at ground floor level with two classrooms at first and second floor levels; erection of a separate four storey rear extension to form a disabled lift with kitchenette and wc at ground floor level.	Permission	12.08.2005
20010332	Application for Listed Building Consent for the erection of three storey rear extension to house stairway involving removal of the existing external fire escape staircase; installation of two windows to replace fire escape doors at second floor level on the rear elevation; installation of new escape stair from basement boiler room enclosed by railings mounted on a low wall with a brick pier involving reconfiguration of basement area; erection of railings mounted on existing front boundary wall 1.8m in height with reconstructed 2.3m high brick piers; an increase in height of the yellow stock garden wall raised to 1.7m in height on the north side and demolition of part of south side garden wall to enlarge the car park.	Permission	25.06.2001
20010331	Erection of three storey rear extension to house stairway involving removal of the existing external fire escape staircase; installation of two windows to replace fire escape doors at second floor level on the rear elevation; installation of new escape stair from basement boiler room enclosed by railings mounted on a low wall with a brick pier involving reconfiguration of basement area; erection of railings mounted on existing front boundary wall 1.8m in height with reconstructed 2.3m high brick piers; an increase in height of the yellow stock garden wall raised to 1.7m in height on the north side and demolition of part of south side garden wall to enlarge the car park.	Permission	25.06.2001
19990586	Application for Listed Building consent for internal alterations to the basement and first and second floors.	Permission	14.10.1999

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- 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 the Highway Network
- TC2 – Listed Buildings
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 4 – Decision Making
- 8 – Promoting healthy and safe communities
- 9 – Promoting sustainable transport
- 12 – Achieving sustainable development and well-designed places
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006)
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Other Relevant Council Documents

Also of relevance are the published Gravesham Open Space, Sport & Recreation Assessment, Strategy & Action Plan which has two components being the technical based assessments and the Strategy/Standards.

Of particular relevance are:

- Knight, Kavanagh & Page GBC Playing Pitch Strategy – Final Assessment Report, June 2016
- Knight, Kavanagh & Page GBC Playing Pitch Strategy and Action Plan, August 2016

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

The Council has a statutory requirement under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant listed building consent for any works to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Consultations, Publicity and Representations

Consultees

KCC – Heritage Conservation

The site lies within an area of multi-period archaeological potential. However, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

GBC – Highways Officer

28.04.23

I have no objections to this proposal given the revised Design and Access Statement dated 24th April 2023.

15.03.23

In the interests of a uniform approach the use of rented or leased spaces is not considered appropriate unless supported by a legal undertaking to provide the spaces in perpetuity. This site is also more complicated as the offsite car parking is provided by more than one provider.

KCC comments for 20221187 and fully supported by me, are.

I have major concerns with the parking provision of this proposal. Whilst there appears to be an informal arrangement with North Kent College for the use of their car park, this application is for permanent consent - whereas the previous application was for a temporary permission and the arrangements with the College covered this. I would therefore like to see a permanent legal arrangement with the College to cater for the overall quantity of car parking spaces required - 128 according to the data submitted.

If the parking arrangement with the College were to cease, this could result in a significant number of vehicles parked on-street in the local roads where there is currently no restrictions on a Sunday. This could result in a highway safety issue and severe congestion in the area.

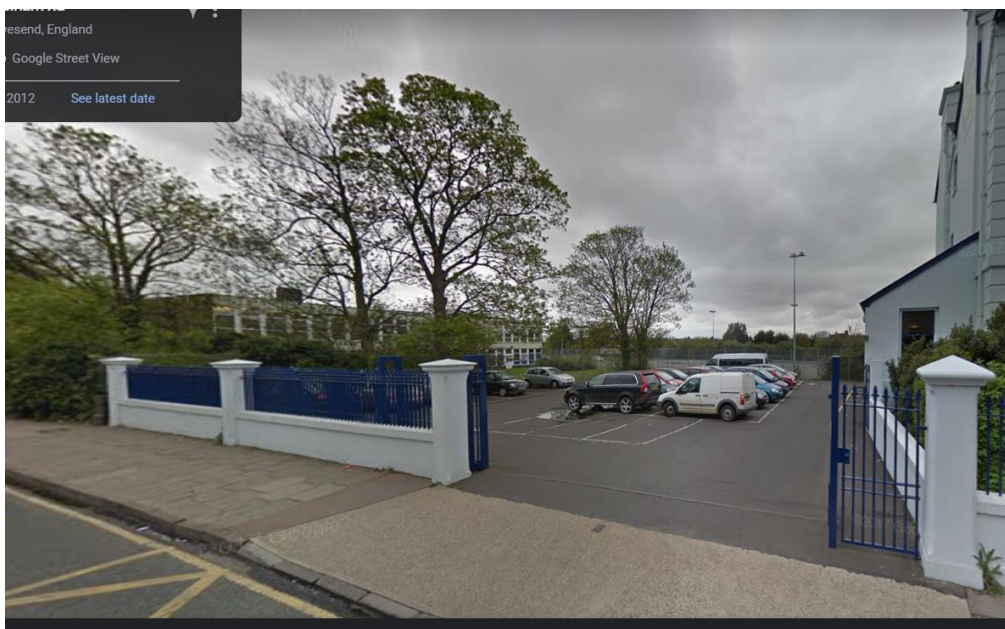
I would therefore request a holding objection until such time as a permanent parking solution has been secured.

Here the intention is to remove car parking and rely on rented spaces, so the same approach is appropriate.

Considering the images in Google Street View, and it has to be accepted no details are provided on day or time with these images there is a wide-ranging demand for car parking in the car park in question. They do however demonstrate the car park to be well used and exceeding the suggested nine parking space that would be provided if this application were approved.



September 2008



May 2012



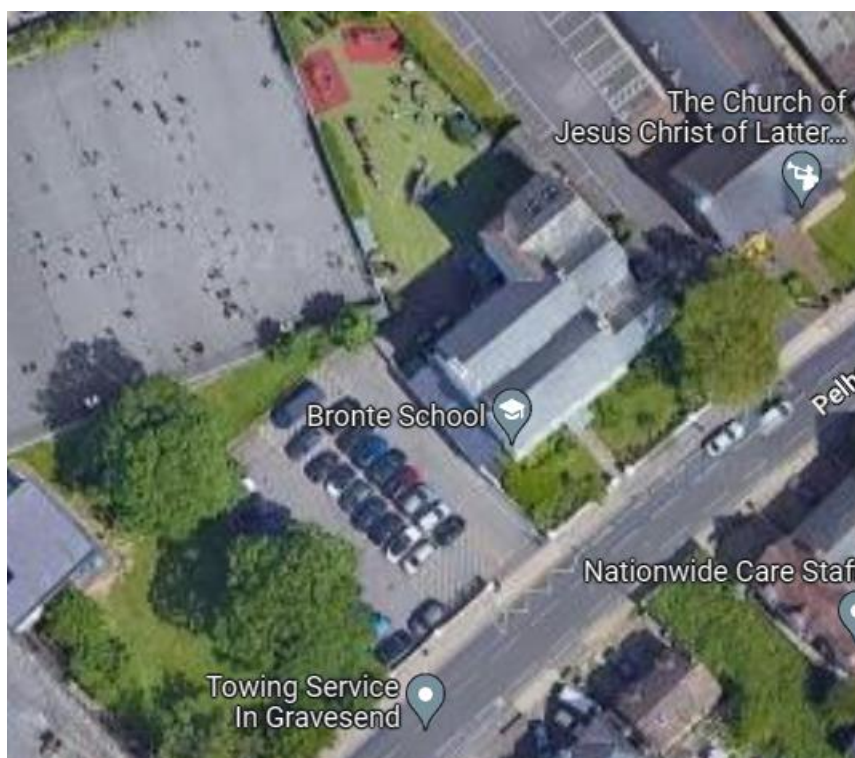
July 2016



December 2020



November 2022



Undated satellite image

Whilst I accept that the site is close to the Gravesend Town Centre and its public car parks the most local is opposite the railway station and is liable to be in high demand by commuters. The Thamesgate Shopping Centre, whilst close has a parking fee structure to deter commuter parking.

Given the available information and to ensure a uniform approach with The Maltings application I would recommend refusal of the application.

GBC – Conservation Architect

No comments received.

Neighbouring properties

- Impact on health and safety
- Increased flow of traffic-build up
- Increase in people and associated vehicles
- Loss of privacy
- Impact on parking
- Parking congestion
- Highway safety
- Risk of anti-social behaviour

Proposal

The sports/play area, or multi-use games area (MUGA) would be located to the northwest of the existing car park which is located to the west of the main school building. It would measure 23.86m wide along the southeast side, increasing to 25.24m on the northwest side and 16.8m wide. The area would be enclosed by 4m high wire mesh fencing along the southeast, southwest and northwest boundaries, as well an approximately 500mm high low level boundary wall, 1.6m high picket fence and 480mm raised beds/brick planters. The area would be surfaced with synthetic turf and would have benches along the side lines. Access would be by way of 3m wide double gates along the southeastern entrance and would be open to the northeastern side which would have direct access to the rear of the school grounds and building.

Existing Layout



Site Description and Surroundings

The application site is the Bronte School, an independent preparatory school for boys and girls aged 3 to 11. The school is located within the urban area of Gravesend within close proximity to the main town centre and railway station. Pelham Road is served by a main bus route. The site sits just outside the Pelham Road/The Avenue Conservation Area. The main school building itself is Grade II Listed.

The area that is the subject to this application is the existing car park located to the west of the main building and currently provides 28 car parking spaces and a mini bus space that is used for staff only and is not used by parents/carers for drop-off or pick-up.

The school only benefits from a play/garden area to the rear of the building which is mainly used by younger children. Older children use the tennis courts located to the north west which are owned by the neighbouring Mayfield School. The courts are used on a daily basis for play and sports, for a small fee.

Key issues:

- Principle of Development
- Character and Appearance
- Impact on the Listed Building
- Impact on Local Residential Amenity and Existing Residents - Noise and Lighting Impacts
- Highways and Parking
- Other Material Planning Considerations - Trees/Landscaping, Ecology, Biodiversity and Archaeology

Principle of Development

Policy CS01 (Sustainable Development) sets out that support will be given to proposals that accord with the development plan. A positive approach to new development will be taken that reflects the presumption in favour of sustainable development set out in the NPPF (2021) and the Local Plan Core Strategy (2014).

Policy CS10 (Physical and Social Infrastructure) supports proposals and activities that protect, retain or enhance existing social infrastructure. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.

Policy CS13 (Green Space, Sport and Recreation) indicates that the Council will seek to make adequate provision for and protect and enhance the quantity, quality and accessibility of green space in accordance with an adequate up to date and relevant evidence base.

The proposal would utilise the existing car park and would provide a much needed multi-use games area for the pupils of the school which would enhance their ability for play and sports within the safety of the school grounds.

The proposal therefore accords with Policies CS01, CS10 and CS13 of the Local Plan Core Strategy 2014 (LPCS) and the principle of the development is acceptable.

Character and Appearance

CS19 (Development and Design Principles) (LPCS) sets out the design principles which will be taken into account when considering proposed redevelopment proposals. The policy requires new development to be visually attractive, fit for purpose and locally distinctive. In particular, the design of new development should be derived from a robust analysis of local context and character, make a positive contribution to the street scene and the character of the area and integrate well into the surrounding area. At a national level the revised National Planning Policy Framework 2021 (NPPF) in section 12 provides guidance on achieving well designed places.

CS20 (Heritage and the Historic Environment) (LPCS) states that proposals and initiative will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their

setting where it contributes to the significance of the asset.

Whilst the main building of the Bronte School is Grade II Listed, the proposal would utilise a portion of the existing car park to the west of the school building. The car park is tarmacked and provides little visual enhancement to the school or the area. To the rear of the car park is the adjoining school's tennis courts which are enclosed by chain link style fencing. The proposed multi-use games area would provide a much needed facility for the school and its pupils and the design has incorporated similar fencing to the adjacent courts and includes raised planters and the surface area would be synthetic turf. As such, the proposal would have more visual enhancements than the existing and as such would not have a negative impact on the school or the character of the surrounding area.

Existing Streetscene



Site Area for Proposed Sports/Play Area



It is considered that the proposal would not have any detrimental impact on the adjacent listed building and would result in a positive improvement to the visual amenity of the existing car park area, whilst providing much needed play/sports facility for the students of the school.

The development would therefore be in accordance with Policies CS19 and CS20 (LPCS) and paragraph 130 of the NPPF (2021).

Impact on the Listed Building

The associated building of the main school is Grade II Listed. In terms of the impact on the heritage of the building, there are no proposed external works to the main building. The proposed sports/play area would be located to the west of the school building within the existing car park which is tarmacked.

Policy CS20 (Heritage and the Historic Environment) (LPCS) states that the council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets.

The proposal would not result in any changes to the Grade II Listed Building and as such the proposed development accords with Policy CS20 (LPCS) and section 16 of the NPPF (2021).

Impact on the Conservation area

The site is adjacent the Pelham Road/The Avenue Conservation area but due to the small scale nature of this development will have no impact on the setting of the adjacent conservation area.

Impact on Local Residential Amenity and Existing Residents - Noise and Lighting Impacts

Paragraph 130 of the revised NPPF (2021) seeks to ensure decisions “*create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future user*”.

Policy CS19 (Development and Design Principles) (LPCS) seeks to ensure new development is located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight of its occupants and those of neighbouring properties and land, new development should meet the requirements of the Nationally Prescribed Space Standards in terms of the size of the accommodation being provided based on the level of occupancy, bedroom size and building height and the adopted Residential Layout Guidelines in terms of the appropriate levels of private amenity space for future residents.

The NPPF (paragraph 130) also assists and seeks to ensure developments will function well, that they do not undermine the quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”.

The site is an existing school which currently have a play/garden area directly to the rear of the main building, with the tennis courts of the adjacent Mayfield School located to the northwest which are currently used by the students. The proposed multi-use games area would be located within the existing car park, adjacent to the tennis courts.

The existing car park and the adjacent tennis courts have existing lighting in the form of tall floodlights. The proposed new parking area and the sports/play area would also require similar lighting. The proposal lighting for the car park area would comprise of some low level lighting in the form of lights mounted on posts of approximately 1m in height, some medium level floodlighting at around 4m in height. The sports/play area would comprise some low level lights on 1m high posts, some higher level floodlights on

mast-type towers between 8 and 10m high which are lower than the lighting towers of the existing tennis courts.

Taking into account the location of the proposed sports/play area, distance to neighbouring residential properties, the existing nature of the site and its use and the existing lighting, it is considered that the proposed sports/play area, together with the new lighting requirements for the new parking layout and the sports area would not result in a detrimental impact on the living conditions of neighbouring residents or have any environmental impacts and as such, the development is therefore in accordance with Policy CS19 (LPCS) and paragraph 130 of the NPPF (2021).

Parking and Highways

The proposed development needs to be considered against Gravesham Local Plan Core Strategy Policy CS11 which states that new developments should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities.

The existing access will remain and unaltered. The application site is located on the main Pelham Road which is served by a local bus service. It is also located within a short walking distance of the town centre which benefits from a mainline train station as well as a number of public car parks.

The proposal would result in a loss of 19 parking spaces but would retain 9 spaces for staff use, 2 visitor spaces and the mini bus space. There is no contractual requirement for the school to provide parking for staff. The retained parking spaces would be used by senior staff and administrative staff, such as the caretaker. The car park is not for use of parents/carers for school drop-off and pick-up.

Taking into account the sustainable location of the school, within close proximity to both public transport and public car parks, it is considered that the provision of a much needed sports/play facility for the students would outweigh the need for on-site staff parking.

Therefore in respect of parking and highways the proposal is considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).

Other Material Planning Considerations

Trees and Landscaping

Gravesham Local Plan Core Strategy Policy CS19 requires that proposals should include details of appropriate hard and soft landscaping while the NPPF in paragraph 130 (b) requires that development should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

The proposal would not result in any loss of trees, however it does propose to incorporate raised planters which would result in a positive contribution to the area.

Ecology and Biodiversity

Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy indicates that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development, and that where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory

provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

The site is an existing tarmacked car park which does not have any trees or planting. The proposal would incorporate raised planters and additional tree. Therefore the proposal would result in a biodiversity net gain which would accord with Policy CS12 (LPCS).

Archaeology

The application site is located within an area of multi-period archaeological potential. However, as the site is an existing car park, it is not considered that the proposal would result in any significant below-ground archaeological impact.

The proposed development accords with Policy CS20 (LPCS) and section 16 of the NPPF (2021).

Conclusion

It is considered that the proposal would accord to local and national planning policy and is therefore recommended for approval.

Recommendation:

Permission

See draft Decision

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

Case Officer:	Mrs Amanda Grout	Team Leader:	Richard Hart
Signed:	<i>A Grout</i>	Signed:	<i>R Hart</i>
Dated:	31 st May 2023	Dated:	1st June 2023