



Delegated Report

Approval of Details Application

Planning Application No: 20251242

Location: Land At Former Northfleet Cement Works The Shore Northfleet
Gravesend

Description: Application for the approval of condition 13 (Ecology) attached to planning reference number 20220226.

Applicant: C/O Agent

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Planning Application Form;
Covering Letter; and
Drawing No. HV1B-ARCH-902 Rev C1 - Sales Area/ Access Road Bird and Bat Box Locations.

Relevant Planning History

Reference	Description	Decision	Decision Date
20220226	Temporary Access and associated landscaping and parking for the sales suite at Northfleet Embankment West site	Permitted	05.10.2022

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design & Development Principles

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 4 – Decision-making
- Section 12 – Achieving well-designed places

Consultations

KCC - Biodiversity

20.01.26

We have reviewed the submitted documents in relation to condition 13 of permission 20220226 and advise the following changes to maximise the chance the boxes will be used, and to avoid any welfare issues in relation to nesting birds:

- Removing the bird boxes from the plans. Bird boxes, especially open fronted boxes are unlikely to be used when placed on exposed poles. Bird boxes on exposed poles also risk over-exposure to the sun which could result in any chicks inside dying1;
- Using a bat box(es) specifically designed for pole mounting with plans ideally reflecting the change. The bat boxes chosen are poorly designed for use on poles. See examples of pole mounted boxes including the poles here: Pole Mounted Maternity Bat Box | NHBS Practical Conservation Equipment.

Officer's Analysis

Proposal

This application is for the approval of Condition 13 attached to planning permission reference number 20220226 relating to relating to Ecology.

Submitted Details

The following information has been submitted to discharge Conditions 13:

Planning Application Form;
Covering Letter; and
Drawing No. HV1B-ARCH-902 Rev C1 - Sales Area/ Access Road Bird and Bat Box Locations.

Condition 13 - Ecology

13. *The development hereby approved shall not be brought into use until a scheme for providing bat roosting opportunities at the site, in line with the recommendations of the Ecology Technical Note (AAe May 2022) has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to the development hereby approved being brought into use.*

Reason: *In order to enhance the biodiversity of the site in accordance with adopted Local Plan Core Strategy Policy CS12 of the Gravesham Local Plan: Core Strategy (September 2014).*

Kent County Council Biodiversity were consulted on the submitted Ecology Plan and they advised that to;

- Removing the bird boxes from the plans. Bird boxes, especially open fronted boxes are unlikely to be used when placed on exposed poles. Bird boxes on exposed poles also risk over-exposure to the sun which could result in any chicks inside dying1;
- Using a bat box(es) specifically designed for pole mounting with plans ideally reflecting the change. The bat boxes chosen are poorly designed for use on poles. See examples of pole mounted boxes including the poles here: Pole Mounted Maternity Bat Box | NHBS Practical Conservation Equipment.

These amendments were recommended to maximise the likelihood of the boxes being utilised by the target species and to avoid potential welfare issues associated with nesting birds.

The applicant was advised that revised details were required to address these concerns and make the submission acceptable. However, despite numerous requests, no amended details have been provided.

As a result, the submitted information remains insufficient to satisfy the requirements of Condition 13.

Accordingly, Condition 13 cannot be discharged, and the application is refused.

It is considered that insufficient information has been submitted to demonstrate compliance with the requirements of the condition or to ensure that the proposed measures would achieve the purpose of the condition, namely to enhance the biodiversity value of the site.

Conclusion & Recommendation

The details submitted with this application are considered to be insufficient to discharge condition 13 of planning approval reference; 20220226.

RDET - Refusal of Details

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

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	27 th July 2026	Dated:	28 th July 2026