

Delegated Report

Approval of Details Application

Application no: 20260378

Location: Scouts Hall Hampton Crescent Gravesend Kent

Description: Application for the approval of condition 5 (Biodiversity Gain Plan), condition 6 (Landscape and Ecological Management Plan (LEMP)), condition 8 (Cycle Storage Facilities) and condition 10 (External Lighting) attached to planning reference number 20250130.

Applicant: Mr Andrew Jarvis

Site Visit Date: N/A

Planning permission was granted for the provision of a new modular-built scout and community facility to replace the existing building on-site, including associated landscaping and parking areas under application ref. 20250130 on 06.11.2025. This was subject to a number of conditions including condition nos. 5, 6, 8 and 10 which this application seeks to discharge.

The information that has been submitted is:

- Covering letter;
- Application form;
- Lights – Wolf Mini data sheet;
- BNG Metric;
- Landscape, Enhancement and Management Plan by arbtech Issue 2, 24/11/2025;
- External Lighting Plan – Proposed;
- Wardale Cycle Shelter details; and
- Bike Shelter details.

Consultations

KCC Biodiversity

We have reviewed the submitted documents in relation to approval of condition 5 (Biodiversity Gain Plan), condition 6 (Landscape and Ecological Management Plan (LEMP)), condition 8 (Cycle Storage Facilities) and condition 10 (External Lighting) attached to planning reference number 20250130 and advise that **insufficient** ecological information has been provided to discharge condition 10.

Condition 5 states: *Prior to any landscaping works commencing on site a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Net Gain Metric and the Biodiversity Net Gain Assessment Issue 2.1 by Arbtech Consulting Ltd (January 2025). The approved plan shall be implemented as described and retained thereafter.*

This development requires a 10% mandatory biodiversity net gain under legislation.

The general biodiversity gain condition as per Schedule 7A, Section 13(1) of the Town and Country

Planning Act 1990 is that the development may not be begun unless—

(a) a biodiversity gain plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.

We have reviewed the submitted documents (Biodiversity Gain Plan and Statutory metric) in relation to the general biodiversity gain condition of permission 5 and advise that **sufficient** information has been provided to discharge the deemed condition. BNG can be achieved through both on and off site habitat creation. The onsite BNG can be achieved through the creation of other neutral grassland, with the off-site BNG being achieved through the purchase of traditional orchard and mixed scrub habitat units.

Table 1 shows a summary of the information as submitted. Further details are provided in Table 2.

Table 1: To show a summary of our review of submitted information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	10%	N/A	2 – no significant on-site and off-site	No

Detailed Comments

Legislation and government standing advice indicates that the information shown in Table 21 needs to be submitted to and approved by the local planning authority as part of the 'deemed condition' biodiversity gain plan prior to commencement of development.

References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric. As such, a copy of the completed biodiversity metric calculation tool, in excel spreadsheet format, has been submitted as part of this submission in conjunction with the biodiversity gain plan. The local planning authority must approve the biodiversity gain plan; without approval, the development may not commence.

Table 2: To show the information required for the biodiversity gain plan under legislation and as indicated by government standing advice, and whether the submitted information is sufficient.

Information Needed	Provided	Comments
The steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat. And, (except for onsite irreplaceable habitats) a description of how the biodiversity gain hierarchy will be followed and where to the extent any actions (in order of priority) in that hierarchy are not followed and the reason for that.	Yes	The applicant is required by law to deliver biodiversity gains in accordance with the biodiversity gain hierarchy, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 Section 37A. We are satisfied that the applicant has appropriately applied the hierarchy to this development.
The <u>relevant date</u> , for the purposes of calculating the pre-development biodiversity value of onsite habitats and if proposing an earlier date, the reasons for using this earlier date.	Yes	With the original application, the applicant has provided the date of 07/10/24 as the date of the pre-development biodiversity site walkover to establish the habitats present. The walkover established the habitats present at baseline and the biodiversity metric calculations made on 30/01/25. This is considered acceptable to inform the application.



Information Needed	Provided	Comments
The completed biodiversity metric calculation tool(s), stating the publication date of the tool(s), and showing the calculation of the pre-development onsite value on the relevant date, and post-development biodiversity value. And, evidence that biodiversity gain objective can be met.	Yes	We have reviewed the metric and we are satisfied that it has been correctly filled in and no amendments are required. LEMP corresponds with the habitats planned for creation within the metric.
Pre-development and post-development plans showing the location of onsite habitat (including any irreplaceable habitat) on the relevant date, and drawn to an identified scale and showing the direction of North.	Yes	
A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date, and any part of the development for which planning permission is granted where the onsite habitat of that part is irreplaceable habitat, arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.	N/A	None present on site
If habitat degradation has taken place: - a statement to this effect, - the date immediately before the degradation activity, - the completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and - any available supporting evidence for the value.	Yes	The applicant indicated that no on-site habitat degradation has occurred since 30 th January 2020. This is corroborated by a review of aerial imagery (Google Earth Pro, accessed 26/06/26).
Where any registered ² off-site biodiversity gain is specified in the plan and allocated to the development: - The registered off-site biodiversity gain is so allocated (and, if the allocation is conditional, that any conditions attaching to the allocation have been met, or will be met by the time to development begins), and - The registered off-site biodiversity gain has the biodiversity value specified in the plan in relation to the development.	Yes	We advise that we are satisfied that an off-site BNG of at least 10% can be achieved through the creation of mixed scrub and traditional orchard. An off-site habitat bank will be used to achieve the BNG and the biodiversity gain site register number is BGS-210825001 and BGS-250425002. We are satisfied that the reasons for using a BNG habitat bank are appropriate for this application.
Evidence that any biodiversity credits specified in the plan have been purchased.	N/A	
Name and address of the person completing the Plan, and (if different) the person submitting the Plan.	Yes	We've taken this to be the persons submitting the information to discharge the condition
A description of the development and planning permission reference number (to	Yes	

Information Needed	Provided	Comments
which the Plan relates).		
A description of arrangements for maintenance and monitoring of habitat enhancement to which paragraph 9(3) of Schedule 7A to the 1990 Act applies (habitat enhancement which must be maintained for at least 30 years after the development is completed).	Yes	OFF-SITE As the off-site provision is proposed to be through a habitat bank provider, the gain site reference number is considered sufficient evidence that appropriate management will be implemented for the relevant habitats. ON-SITE This is being considered as part of the condition discharge of Condition 6 (Landscape Enhancement and Management Plan).

Condition 6 states: *Prior to any landscaping works commencing on site a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the measures outlined in the Preliminary Ecological Appraisal and Preliminary Roost Assessment Report (Arbtech, Oct 24), Bat Survey Report (Arbtech, Sept 25) and Biodiversity Net Gain Assessment (Arbtech, Jan 25) associated with the planning application and shall include details of the following:*

- a) *Habitat creation measures, including full details of all habitats contributing to BGN onsite*
- b) *A full planting schedule utilising primarily native species;*
- c) *Full elevations plans detailing the model and location of integral swift boxes in accordance with BS 42021:2022 (north/east facing, 4m from the ground and with unobstructed access);*
- d) *Details of externally-mounted bat and bird boxes which are to be of durable construction and suitably located;*
- e) *Locations of 13×13cm holes in close board fencing provided for hedgehogs*
- f) *Rolling, long-term maintenance measures covering up to a 30-year period; and*
- g) *Details of responsible persons.*

The approved plan shall be implemented as described and retained thereafter.

On-site habitat enhancements of bat boxes, wildflower planting and hedgehog highways, plan have been confirmed via the LEMP.

We advise that we are satisfied with the proposed enhancement and on-going management.

We are satisfied that the condition can be discharged.

Condition 8: Cycle Storage Facilities

Reason: outside of our remit Comments not provided

Condition 10 states: *No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the Local Planning Authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity will result. Such details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. The details shall be implemented as approved and retained thereafter.*

The following luminaire specifications must be considered within the lighting strategies to determine effects

on protected species, based on section 4.9 of the Bat Conservation Trust and Institute of Lighting Professionals 'GN08: Bats and Artificial Lighting', which have been met:

- <1 lux light spill into identified bat foraging/commuting corridors (ideally 0.2 horizontal and 0.4 vertical) **(confirmation of horizontal direction of light spill to not affect foraging/commuting corridors)**
- LED with no UV element **(LED proposed)**
- Warm lighting preferred (<2700K) **(colour temperature provided currently exceeding 2700K, but can be changed to compensate)**
- Recessed/downward facing **(0% upward illumination pattern, use of baffle/hood)**
- Motion sensors (PIR) **(currently no confirmation on motion sensors, but should be changed to compensate or provide confirmation on external lighting timing of usage)**

Details of the lighting provided do not currently meet the Bat Conservation Trust standards, as the colour temperature exceeds the 2700K maximum and has no details on all exterior lighting points planned usage. In addition to this, no formal Sensitive Artificial Lighting Strategy has been provided, as stated within the LEMP as one of the enhancements.

It would be preferable that the lighting meets those requirements but we acknowledge that it is the scout hall and therefore will not be operational 24hours a day.

We advise that the lighting must be switched off when the hall is not in use.

The condition can be discharged.

Analysis

Condition 5

Condition 5 is as follows:

5. Prior to any landscaping works commencing on site a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Net Gain Metric and the Biodiversity Net Gain Assessment Issue 2.1 by Arbtech Consulting Ltd (January 2025). The approved plan shall be implemented as described and retained thereafter.

Reason: *To ensure that the Biodiversity Gain Plan is in accordance with the biodiversity and ecological information submitted with the planning application and as approved in order to protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (2024).*

KCC Biodiversity requested this condition and so they have been consulted and they advise that they have reviewed the Biodiversity Gain Plan and Statutory metric and advise that sufficient information has been provided to discharge the deemed condition. KCC state that BNG can be achieved through both on and off-site habitat creation, the onsite BNG can be achieved through the creation of other neutral grassland, with the off-site BNG being achieved through the purchase of traditional orchard and mixed scrub habitat units.

As such it is considered that sufficient information has been submitted to discharge condition 5 of ref. 20250130.

Condition 6

Condition 6 is as follows:

6. Prior to any landscaping works commencing on site a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the measures outlined in the Preliminary Ecological Appraisal and Preliminary Roost Assessment Report (Arbtech, Oct 24), Bat Survey Report (Arbtech, Sept 25) and Biodiversity Net Gain Assessment

(Arbtech, Jan 25) associated with the planning application and shall include details of the following:

- a) *Habitat creation measures, including full details of all habitats contributing to BGN onsite*
- b) *A full planting schedule utilising primarily native species;*
- c) *Full elevations plans detailing the model and location of integral swift boxes in accordance with BS 42021:2022 (north/east facing, 4m from the ground and with unobstructed access);*
- d) *Details of externally-mounted bat and bird boxes which are to be of durable construction and suitably located;*
- e) *Locations of 13×13cm holes in closeboard fencing provided for hedgehogs*
- f) *Rolling, long-term maintenance measures covering up to a 30-year period; and g) Details of responsible persons.*

The approved plan shall be implemented as described and retained thereafter.

Reason: *To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (2024), and in order for Gravesham Borough Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.*

KCC Biodiversity requested this condition and so they have been consulted and they advise that on-site habitat enhancements of bat boxes, wildflower planting and hedgehog highways, plan have been confirmed via the LEMP. KCC advise that they are satisfied with the proposed enhancement and on-going management and that they are satisfied that the condition can be discharged.

As such it is considered that sufficient information has been submitted to discharge condition 6 of ref. 20250130.

Condition 8

Condition 8 is as follows:

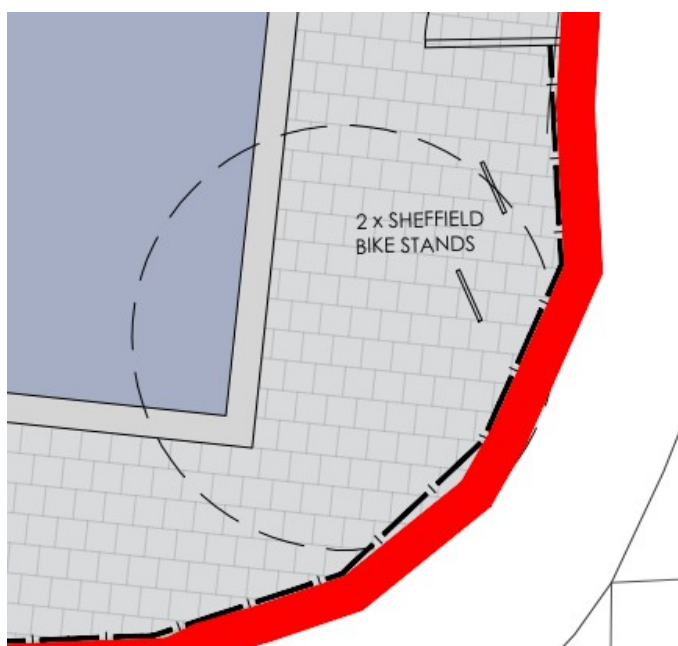
8. Prior to the replacement Scout Hall first coming into use, details of the provision of secured and covered cycle storage facilities shall be submitted to and approved in writing by the Local Planning Authority. The approved cycle storage facilities shall be provided prior to the first use of the building and thereafter be retained for such purposes at all times.

Reason: *In order to encourage options for sustainable travel in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and saved Policy P3 of Gravesham Local Plan First Review (1994).*

Originally only the Wardale Cycle Shelter details were submitted but this is just the generic manufacturers details where various options are offered regarding length and capacity, cladding type, finish options and colour. No details were provided of which of the options that are available are being proposed. The agent was asked for this information and they have advised that it will be a Broxap cycle shelter for 4 cycles which will be 2000mm in width similar to the below but two hoops instead of five and will be finished in black RAL 9005:



This is considered acceptable in terms of provision and appearance. As the approved plans show in application ref. 20250130, the bike stand will be located at the front of the building:



As such it is considered that sufficient information has been submitted to discharge condition 8 of ref. 20250130.

Condition 10

Condition 10 is as follows:

10. No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the Local Planning Authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity will result. Such details shall include a layout plan with beam orientation and a schedule of light

equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. The details shall be implemented as approved and retained thereafter.

Reason: *To limit the impact of light pollution from artificial light and consideration for bats and other nocturnal wildlife in accordance with paragraphs 187(d) and 198(c) of the National Planning Policy Framework (2024).*

KCC Biodiversity advise that the lighting details provided do not currently meet the Bat Conservation Trust standards, as the colour temperature exceeds the 2700K maximum, there are no details on all exterior lighting points planned usage and no formal Sensitive Artificial Lighting Strategy has been provided, as stated within the LEMP as one of the enhancements. However, they then go on to state that although it would be preferable that the lighting meets those requirements, they acknowledge that it is a scout hall and therefore will not be operational 24hours a day and that it must be switched off when not in use. They then advise that the condition can be discharged.

Therefore, it is the case that not all of the details have been provided but as this is a use where the hall will not be in operational 24 hours a day then they find it acceptable that the condition can be discharged.

As such, it is considered that sufficient information has been submitted to discharge condition 10 of ref. 20250130.

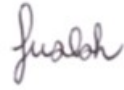
Conclusion

It is considered that sufficient information has now been submitted for the discharge of condition nos. 5, 6, 8 and 10 of planning permission reference number 20250130.

Recommendation:

Approval of details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	27th July 2026	Dated:	28 July 2026