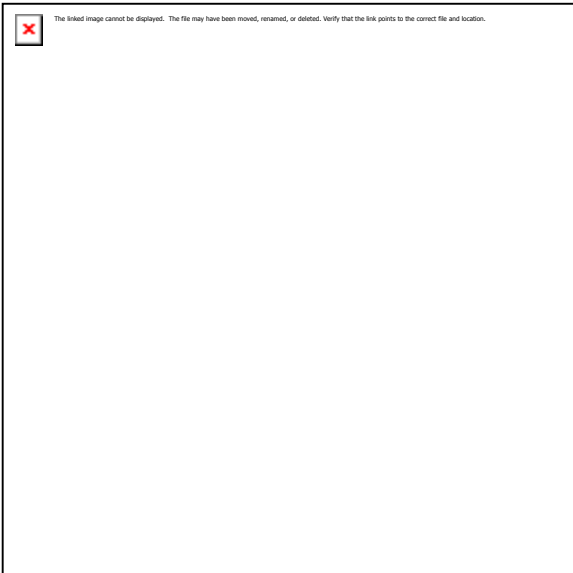




Delegated Report

Householder Planning Application

Planning Application No: 20220305

Location: Land At 270-340 Valley Drive Gravesend Kent

Description: Application for approval of condition 15 attached to planning permission reference number 20190155 relating to details of bat roosting opportunities.

Applicant: Mr Jason Wild

Site Visit Date: Various

Submitted Documents/Plans

Application form;
Covering letter;
Drawing No.17-313 / L(00) 001 Rev A – Location Plan; and
Bat Enhancement Strategy (2019).

Relevant Planning History

20190155 - Demolition of four, two-storey existing flat blocks consisting of 36 bedsits, as well as associated outbuildings, enclosures and garage structure; redevelopment of the site to provide two, two and three storey blocks with ancillary structures, associated car parking, landscaping and new access from Valley Drive. The blocks will contain a total of 48 affordable units including 32 x 1 bedroom rented flats for over 55's, as well as 16 general needs flats. - **Permitted 6.2.2020**

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development

- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

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
- 12 – Achieving sustainable development and well-designed places

Consultations, Publicity and Representations

Consultees

KCC Biodiversity Officer

The buildings had low potential to be used by roosting bats and stated that bat emergence surveys were required. As a result of reviewing the satellite photos we understand that the buildings have already been demolished and therefore if bats were roosting within the buildings, we advise that (without mitigation) the works would have resulted in a breach of wildlife legislation.

We question if the recommended bat emergence surveys were carried out and in that situation we require the results of the surveys to be submitted as part of this condition discharge.

Five integrated bat boxes are proposed to be erected on northern and western aspects of the buildings. Typically bats prefer boxes to be located on the southern and eastern aspects of the building and therefore we require confirmation of why the bat boxes have been proposed to be located within northern and western aspect. The bat boxes may have been located on those aspects due to the results of bat emergence surveys but if this is not the case, we recommend that the integrated features are located within the courtyard area. As the planting of the communal gardens, if native species incorporated in to the planting plan, is likely to be beneficial to foraging bats.

Officer's Analysis

Condition 15

Prior to the first occupation of the development hereby approved a scheme for providing bat roosting opportunities at the site, in line with the recommendations of the Bat Survey Report (Greengage, September 2017) has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to the first occupation of the residential units hereby permitted.

The following information has been submitted to discharge condition 15

- Application form;
- Covering letter;

- Drawing No.17-313 / L(00) 001 Rev A – Location Plan; and
- Bat Enhancement Strategy (2019).

KCC Biodiversity Officer states the following.

We question if the recommended bat emergence surveys were carried out and in that situation we require the results of the surveys to be submitted as part of this condition discharge.

The applicant confirmed that the above was not undertaken as the buildings were demolished, however, they confirm that there were no signs of Bats within the existing building and they were aware of Wildlife and Countryside Act (1981) (as amended) *in regards to disturbing Bats.*

Regarding roosting bat opportunities condition 15, we have confirmed with site that the recommendations of the bat enhancement strategy November 2019 as per page 5 will be implemented at Valley Drive.

For the avoidance of doubt, the bat boxes as shown on page 5 are shown below.

Appendix 1: Locations of the bat boxes on the new buildings



It is considered that the proposed 5 bat roosting boxes along with the native planting approved by 20220484 (Application for approval of condition 9 attached to planning permission reference number 20190155 relating to a scheme detailing the proposed soft landscaping) provide sufficient bat roosting opportunities at the site and no further information is required. The comments from KCC Biodiversity Officer have been taken into account when considering this application.

No further information is required and condition 15 can be discharged.

Conclusion & Recommendation

Discharge Condition 15

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

Case Officer:	Mr Richard Hart	Team Leader:	Miss Faye Hobbs
Signed:	<i>R Hart</i>	Signed:	
Dated:	4th July 2022	Dated:	06 July 2022