

Delegated Report

Planning Application

Planning Application No: 20211541

Location: Metropolitan Police Specialist Training Centre Mark Lane Gravesend Kent

Description: Erection of a new concrete live fire skills house training building (plus abseil frame) with new ancillary support building and associated works.

Applicant: The Mayor's Office For Policing And Crime

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Application Form;
Covering Letter – Dated 2 December 2021;
Design & Access Statement;
Flood Risk Assessment;

Drawing No. CTG-SP-0000 Rev P3 – Site Location Plan;
Drawing No. CTG-SP-0001 Rev P2 – Existing Site Plan;
Drawing No. CTG-EL-009 Rev P1 – Existing Elevations;

Drawing No. CTG-SP-0002 Rev P4 – Proposed Site Plan;
Drawing No. CTG-EL-0010 Rev P3 - Proposed Elevations;
Drawing No. CTG-EL-011 Rev P2 – Proposed Support Building Elevations;
Drawing No. CTG-PL-0003 Rev P3 – Proposed Ground Floor Plan;
Drawing No. CTG-PL-0004 Rev P3 – Proposed Level 1 Floor Plan;
Drawing No. CTG-PL-0005 Rev P3 – Proposed Level 2 Floor Plan;
Drawing No. CTG-PL-0006 Rev P3 – Proposed Level 3 Floor Plan;
Drawing No. CTG-PL-0008 Rev P3 - Proposed Support Building Plans;
Drawing No. CTG-SE-0038 Rev P3 – Proposed Sections A-A & B-B;
Drawing No. CTG-SE-0039 Rev P3 – Proposed Sections C-C & D – D; and.
Drawing No. CTG-SE-0040 Rev P3 – Proposed Sections E- E.

Relevant Planning History

19960086 - Circular 18/84 Consultation for the establishment of a Firearms Training Centre involving the use of the College buildings as tactical training rooms, 25m ranges, classrooms, offices, student accommodation and other ancillary facilities; use of 3 no. dwellings as 360 degree live fire training houses; outline consultation for the erection of a tactical training area including an indoor drive-in range with 50m range and control tower at 1st and 2nd floor levels; and provision of additional car and coach parking. **No objection – 13 November 1997**

There have been various other planning applications on this site, but none of them are specific to this application.

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 - Heritage

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC7 – Archaeological sites
- T1 – Impact of Development on the Highway Network

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
- 14 – Meeting the challenge of climate change, flooding and coastal change.
- 15 – Conserving and enhancing the natural Environment

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006)

Consultations, Publicity and Representations

Consultees

Internal

GBC - Environmental Protection Team (Regulatory Services)

Please include the following:

- Drainage/sewerage informative
- Code of Practice on Construction and Demolition
- Watching Brief Condition

External

KCC - Highways and Transportation

No highway implications associated with the proposals. Please include standard informative

KCC – Flood and Water Management

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment prepared by Atkins dated December 2019 and agree in principle to the proposed development.

The proposed development is to be situated on an existing paved car park area which will not increase the impermeable areas. A drainage strategy will be required for the detailed design approval which should show all existing drainage within the area especially the networks to be utilised and provide a betterment in accordance with CIRIA 753.

Should your authority be minded to grant permission for the proposed development, we recommend two SUDS conditions along with breeding bird informative.

KCC – Heritage

The site lies within an area of multi-period archaeological potential adjacent to the Thames. The Historic Environment Record records the presence of former salt workings at the site and this area is underlain by alluvial deposits, including peat horizons above former early prehistoric land surfaces which will have both archaeological and palaeoenvironmental potential. Standard archaeological condition to be included:

KCC - Dartford Group Fire Safety Office

Although 'off-site' access to the proposed building can be achieved, please confirm that once on site there is vehicle access for a pump appliance to within 45m of every point of the footprint of the building or 15% of the perimeter.

Applicants should be aware that in the event of planning permission being granted the Fire and Rescue Service would require emergency access, as required under the Building Regulations 2010, to be established.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

Marine Management Organisation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

<https://www.gov.uk/guidance/make-a-marine-licence-application>

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

Natural England

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to

consult your own ecology services for advice.

Environment Agency
No comment received

Health & Safety Executive - Explosives
No comment received

National Grid UK
No comment received

Neighbouring properties

13 surrounding properties were consulted and a site notice displayed on site. Consultation period expired on 21.01.22 with no comments received.

Officer's Analysis

Principle of Development and use

The original acceptability of the uses of the premises as a public order and firearms training facility was established by the circular 18/84 consultation procedure under application reference 19960086 - as the Metropolitan Police were then under direct control of the Home Office and the proposal was deemed to have been a Crown use of the land. However, the status of the Metropolitan Police has changed with the establishment of the Greater London Authority. Therefore all development on site since 1999 has been subject to a formal planning application.

The application site is within the urban area of Gravesend but adjacent to the Green Belt. See below extract from the Local Plan Proposals map.



Design, Character and Appearance

At a local level Policy CS19 (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Section 12 of the NPPF (2021) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development. It also states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

The design of the development has been carefully considered due to the specific training requirements by the police. The proposal is for the following:

The two buildings are for a live fire skills training house (three-storey plus abseil frame) with a:

- Floor space of 1,046m² and;
- Height of 11m (13m with abseil frame) –
- An ancillary support building (single storey) with a floor space of 134m².

This is shown below:

3D CGI image of proposed development



Aerial view of the existing site



The supporting Design & Access statements confirms that materials on the proposed development will match the existing buildings on site and this will be enforced through an appropriate planning condition.

Construction of a new two storey concrete training building to replace the existing live fire house to provide a more varied training facility for personnel in the use of firearms. The existing live fire accommodation will be retained as a training building. The external finish is to be fair faced concrete with stair and balcony configurations to represent differing building styles for training.

A small ancillary building to provide new toilet facilities kitchenette, instructors' office and operations room is part of the development. New walls are to be fair faced blockwork with a metal roof to match other buildings on the site.

Considering the unique nature of the site and the specific nature of the building and wider site the proposed design is in keeping with the area and no conflict with Policy CS19 (LPCS) or section 12 of the NPPF (2021).

Impact on amenity of surrounding properties

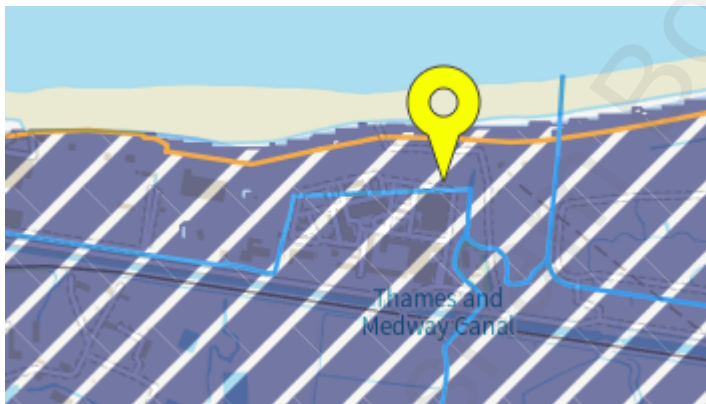
Due to the isolated nature of the site and the use of the site being lawful since 1996 there will be no adverse impact on the amenity of surrounding properties.

No conflict with local or national planning policy.

Flood Risk and Surface Water Drainage

In support of this application a flood risk assessment has been provided. The application site lies within flood zone 3.

This is shown on the map below (Source Environment Agency web site.)



As the development is minor development within Flood Zone 3 a Flood Risk Assessment (FRA) is required.

The report adequately addresses Tidal Flooding, Surface Water Flooding by stating the following.

6.2.1. Tidal flooding

This report has concluded that the proposed site for the training facility is protected from direct tidal flooding by the presence of earth embankments which make up part of the River Thames tidal defences. These defences protect the site from tidal flooding during events with an 0.1% AP for the lifetime of the development (50 years) and up to 2090.

The site has a high residual risk of tidal flooding should these defences breach, with average flood depths across the site estimated to be 1.8m during 0.5% AP event, increasing to 2.09m after 100 years of climate change. These depths and the associated velocities mean that the site would have the maximum flood hazard rating in the event of a breach.

The live fire skills house will be built at ground level, however the ancillary support building will be raised by 1.2m. Flood depths within the ancillary building are estimated to be 0.6m during a 0.5% AP event.

The MPS have a Flood Warning and Evacuation Procedure that triggers a site evacuation upon receipt of a flood warning, which is expected to give 4-6 hours' notice prior to peak water levels in the river. This will ensure no staff and trainees are on site when the risk of breach is at its highest.

6.2.2. Surface water flooding

The site is surrounded by a number of drainage ditches, some of which are classified as main rivers. The outfall of these ditches to the River Thames is flapped and maintained by the EA. In the event of high rainfall coinciding with a high tide, localised surface water flooding could occur across the site, if the capacity of the ditches is exceeded. The Environment Agency's RoFSW classifies the site as having a low risk of surface water flooding between a 1% and 0.1% AP. Flood depths on the site during these events are estimated to be between 300-900mm. The support building is 1.2m higher than ground level, and therefore will be protected from surface water flooding.

The proposed development will not increase the existing risk of surface water flooding, because the works are taking place on an existing hardstanding site, so there will be no change in impermeable areas contributing to increased runoff rates and volumes. The design of the proposed surface water drainage has not yet been finalised, and therefore this FRA may need to be re-visited once the design has been completed.

6.4. Recommendations

Once the proposed surface water drainage design has been finalised, this FRA should be updated to include details of how surface water runoff will be managed on the site, to reduce the risk of flooding and where possible provide details of any positive benefits the development may bring to the local risk of surface water flooding. This document could then be used to support any BREEAM application.

Policy CS18 (LPCS) sets out the requirements for dealing with sustainable drainage and surface water drainage and surface water run-off. Kent County Council (KCC) is the Lead Local Flood Authority and has reviewed the submitted Flood Risk Assessment and raise no objection subject to suitable SUDS conditions being included.

The Environment Agency have been consulted and have provided no comment, However, a similar type of development on the site in 2014 (20141049) they provided a response which applies to this application.

This site lies in an area at risk of tidal flooding. We therefore recommend the occupants agree an emergency response plan with the local authority to ensure their safety in the event that the flood defences are overtopped.

To address the above comment and to be consistent with previous applications on site the following informative will be included:

FLOOD RISK

This site lies in an area at risk of tidal flooding. We therefore recommend the occupants agree an

emergency response plan with Gravesham Council to ensure their safety in the event that the flood defences are overtopped. Please do not hesitate to contact the Environment Agency at kentplanning@environment-agency.gov.uk if you require any further information.

In summary, it is not considered that the proposal would conflict with Policy CS18 (LPCS) in regard to drainage and flood matters subject to the inclusion of the recommended conditions by external consultees

Highway Impacts and Vehicle Parking

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development 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. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

Gravesham Highways Officer raised concern that the proposal gives rise to some concern as it appears to be displacing vehicle parking, with no alternative location being provided for the displaced vehicles.

The agent was asked to clarify how parking will be addressed and stated the following:

- There won't be additional students/instructors to site as a result of the proposals.
- Students are not allowed to park on site, they either travel via public transport and get the taxi service from the station to site or they arrive in the police carrier vehicles.
- There are vehicles currently parked on the planned area for the skills house, these are a mixture of operational and stooge vehicles used for training purposes.
- The number shown on the Google maps image appears to be larger than what it is currently used for, it may be an out of date image. The numbers of vehicles involved are very limited.
- These vehicles will be rehoused around the site, where there is existing capacity.
- We are aware of some parking on the access road outside the site. MPS have confirmed that the majority of these cars actually belong to staff from the next door quarry site.

Gravesham Highways Officer reviewed the above information and was satisfied with the response. No further information is required.

In conclusion, no adverse highway impact and no conflict with local or national planning policy.

Archaeology

The application site is located in an area of significant archaeological potential associated with pre-historic remains, later prehistoric, Romano-British and early medieval burials and occupation. The site is underlain by river terrace gravel deposits which have Palaeolithic archaeological and palaeo environmental potential.

KCC Heritage have identified the proposed development may impact on below-ground archaeological remains (e.g. through the use of piles and for drainage works) and have recommended an appropriate planning condition. Subject to the inclusion of this condition no conflict with local or national planning policy regarding archaeology.

Biodiversity

Policy CS12 (LPCS) requires that sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar site. Secondly by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

Furthermore, this policy requires there to 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.

In the event 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, Policy CS12 (LPCS) requires compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

At a national level the National Planning Policy Framework (NPPF) (2021) states planning decisions should contribute and enhance the natural environment by minimising impact on and providing net gains for biodiversity.

To the east of the application site is two statutory designated sites of European nature conservation importance being the following:

South Thames Estuary Special Protection Area (SPA) - This was designated in March 2000 for its total waterbird assemblage and specific species of wintering and passage birds that feed within the mudflats and grazing marsh in north Kent. This site is located 75m to the north east of the site.

South Thames Estuary & Marshes Ramsar Site – designated in March 2000 for its total waterbird assemblage, specific species of wintering and passage birds, rare invertebrates and rare plants; some typical of grazing marsh habitat.

At a national level there is the **South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI)** – designated for its mosaic of grazing marsh habitats, wintering and passage birds and invertebrate and plant population.

At a local level is the non-statutory designated site known as **Canal And Grazing Marsh, Higham Local Wildlife Site** – wildlife-rich sites selected for their local nature conservation value. They contain important, distinctive and threatened habitats and species. This includes the majority of the former landfill site, the former canal to the east, and the remaining canal to the west and the marshes to the west.

Whilst all of the above is to the east of the application site, the use of the site has already been established and the proposal is to be built on existing car park, thus having no biodiversity loss.

Natural England were consulted and raise no objection to the proposal and KCC Biodiversity team have responded providing the following comments:

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us (including aerial photos and biological records) and the information submitted with the planning application, we advise that the proposed development has limited potential to result in ecological impacts. This is because the development footprint appears to be entirely within an area of existing hardstanding.

However, due to the adjacent sensitive and designated sites (primarily the Thames Estuary and Marshes SSSI, SPA and Ramsar site), it is important that there should be no excessive light spill associated with the new building. If planning permission is granted.

To ensure the above concerns are addressed an appropriate condition relating to external lighting will be included along with a Breeding bird Informative.

Any other issues

Kent Fire & Rescue Service have provided comments and the issues raised will be addressed during the Building Control application. The unique nature of the site (live fire skills centre) ensures there is sufficient fire hydrants etc on site.

However, for the avoidance of doubt an appropriate condition will be included.

Conclusion & Recommendation.

The use of the site has been established and this proposal will provide much needed additional training facilities for the Met Police Force. The design is deemed to be functional and will not harm the character of the wide area.

In regards to biodiversity no harm to the national and internal designated sites to the east and appropriate conditions regarding lighting will be included.

No objections from 3rd parties or internal and external consultees.

(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:	11th February 2022	Dated:	11 February 2022