

Application: 20250028

**TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015 (AS AMENDED)**

NOTIFICATION OF GRANT OF PERMISSION TO DEVELOP LAND
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To: **Mrs Kacey Leigh, Northfleet School For Girls
C/O Mr Robert Froud, Labosport
Unit 3
Unit 3 Aerial Way
Watnall Road
Hucknall
Nottingham
NG15 6DW
United Kingdom**

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **GRANTED PERMISSION** for development of land situate at:

**Northfleet School For Girls
Hall Road
Northfleet
Gravesend
Kent
DA11 8AQ**

and being **Construction of floodlit synthetic turf pitch with perimeter fencing, acoustic fencing, spectator areas and access paths; installation of flood lighting around existing Multi Use Games Area (MUGA); installation of storage container; and formation of landscaped bund.** Your application dated 22nd January 2025 is permitted subject to the following:-

1. The development hereby approved shall be begun not later than 3 years following the date of this decision.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following schedule of approved plans/particulars:

Application for Planning Permission form received 06 June 2025;
Drawing no. 24-004(G-218481) 01 Rev. B Site location plan;
Drawing no. 24-004(G-218481) 02 Rev. A Existing block plan;
Drawing no. 24-004(G-218481) 03 Rev. D Proposed block plan received 02 December-2025;
Drawing no. 24-004(G-218481) 04A Rev. B Proposed pitch layout received 28 November 2025;
Drawing no. 24-004(G-218481) 04A Earthworks received 15 January 2025;

Drawing no. 24-004(G-218481) 05A Rev. B Proposed elevations;
 Drawing no. 24-004(G-218481) 06A Rev. A Lighting overspill;
 Drawing no. 24-004(G-218481) 08 Rev. C Proposed general arrangement;
 Drawing no. 24-004(G-218481) 10A Rev. A Existing and proposed summer markings layouts received 28 November 2025;
 Drawing no. 24-004(G-218481) 12A Rev. A Existing and proposed winter markings layouts received 28 November 2025;
 Drawing no. 24-004(G-218481) 20 Existing and proposed parking arrangements;
 Drawing no. 24-004(G-218481) 21 Proposed bund;
 Design and Access Statement 09 January 2025;
 Preliminary Ecological Appraisal December 2024;
 Preliminary Arboricultural Assessment August 2024;
 Biodiversity Statement & Metric Assessment December 2024;
 Topographical Survey 09 February 2024;
 Desk Study Site Review January 2024;
 Land Registry Plan;
 Noise Impact Assessment 04 April 2025;
 Lighting Details 30 April 2025;
 Bat Activity Surveys August 2025;
 Drainage Strategy August 2025 Rev. B;
 Response to Southern Water;
 Ecology and Drainage Clarifications;
 Typical Synthetic Pitch Section;
 Details of the proposed uses;
 Details of groundworks and pitch construction;
 Letter from the agent dated 30 April 2025;
 Email from the agent received 20 November 2025; and
 Email from the agent received 02 December 2025.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. Prior to the commencement of the development, a detailed sustainable surface water drainage scheme for the site shall be submitted to, and approved in writing, by the Local Planning Authority. The detailed drainage scheme shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of within the curtilage of the site without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- appropriate operational, maintenance and access requirements for each drainage feature or Sustainable Drainage Systems (SuDS) component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on or off site flooding and in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014).

4. From the commencement of works (including site clearance), to avoid impacts to protected and priority species, the following precautionary mitigation should be implemented:

1. Any hedgerow and trees to be retained, including its roots, will be protected from damage;
2. Pre-construction walkover surveys for badgers will be carried out by a suitably qualified ecologist,

3. Prior to any tree pruning (if required), checks for the potential presence of breeding birds and roosting bats, will be conducted by a suitably qualified person.
4. Any required clearance of tall/dense vegetation with potential to support reptiles or great crested newts should be undertaken in two stages, with a first cut to 150mm, followed by a second cut several days later to ground level;
5. Any work to vegetation/structures that may provide suitable bird nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If within the breeding bird season a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.
6. All excavations and trenches will be checked each morning throughout the construction period and prior to infilling;
7. All temporarily stored building materials (that might act as temporary resting places) will be isolated within hardstanding areas and raised off the ground, e.g. on pallets.
8. Measures will be in place to avoid pollution impacts from dust, water and run off, noise and lighting during the construction process.

If at anytime a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works will not resume until any required surveys and/or mitigation are completed

Reason: To protect existing wildlife during the construction works, in accordance with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014.

5. Within 3 months of the date of this permission, a community use agreement, prepared in consultation with Sport England, shall be submitted to, and approved in writing by, the Local Planning Authority. The agreement shall apply to the approved outdoor sports facilities, associated changing and car parking and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Reason: To secure well managed, safe community access to the sports facilities, and to accord with Policy CS13 of the Gravesham Local Plan Core Strategy (2014).

6. Within 3 months of the commencement of works, details and a plan(s) showing how the development will enhance biodiversity, shall be submitted to, and approved in writing by, the Local Planning Authority. This will include a detailed landscaping plan, detail on ownership and responsibilities of the outlined management measures to achieve the proposed habitat target conditions, native and wildlife-friendly planting, integrated durable bat and bird boxes aimed at species of conservation concern and a timetable of works.

The approved measures shall thereafter be implemented in accordance with the approved timetable and maintained in accordance with the approved details. Any trees or plants that die, are damaged, removed or become diseased within five years from the date of planting shall be replaced with a species of a similar size and species during the next available planting season.

Reason: To enhance local provisions for wildlife and biodiversity to mitigate habitat lost by development, in accordance with adopted Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014.

7. Notwithstanding the details shown in the approved drawings or other supporting documents, no works to erect the protective fencing around the approved football pitch shall commence until the full specification has been submitted to and approved by the Local Planning Authority. The protective fencing shall be erected in accordance with the approved details before the development is first brought into use and thereafter shall be maintained in accordance with the approved details.

Reason: In the interests of visual and residential amenity in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

8. Within 3 months of the completion of the development hereby approved, the following information shall be submitted to, and approved in writing by, the Local Planning Authority:
- (a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf - FIFA Quality or equivalent International Artificial Turf Standard (IMS); and
 - (b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches.

Reason: To secure well managed, safe community access to the sports facilities, and to accord with Policy CS13 of the Gravesham Local Plan Core Strategy (2014).

9. Within 6 months of completion of the development hereby approved, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to, and approved in writing by, the Local Planning Authority after consultation with Sport England. This shall include measures to ensure the replacement of the Artificial Grass Pitch within the manufacture's specified period. It should also include the required testing to comply with FIFA Quality certification. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the 3G artificial grass pitch.

Reason: To ensure that the new facility is fit for purpose and capable of being managed and maintained in future and to accord with Policy CS13 of the Gravesham Local Plan Core Strategy (2014).

10. Prior to the first use of the development hereby approved, full details of the acoustic noise barrier (as given in the 'Noise Impact Assessment' by Acoustic Consultants Ltd dated 04/04/2025 report ref: 11302/CP Rev A) shall be submitted to, and approved in writing by, the Local Planning Authority. The noise barrier shall be erected in accordance with the approved details prior to any use first commencing and thereafter retained permanently.

Reason: To protect the residential amenity of surrounding occupiers and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

11. Prior to the first use of the development hereby approved, a Noise Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The approved plan shall contain (but not be limited to) the following:

- Information and advice for Hirers on expected behaviour of users and steps that will be taken if there is unacceptable behaviour.
- Details of a complaints procedure for local residents.
- Details of a complaints log.
- An inspection procedure for checking all perimeter fencing around the AGP and MUGA and arranging repairs as necessary.

The development shall be operated at all times in accordance with the approved plan.

Reason: To protect the residential amenity of surrounding occupiers and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

12. Prior to the first use of the development hereby approved, a Travel and Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Kent County Council as the Highway Authority. The development shall be operated at all times in accordance with the approved plan.

Reason: To ensure traffic generation and parking demand are managed and to encourage sustainable transport, in accordance with Policy CS11 of the Gravesham Local Plan: Core Strategy (2014) and Saved Policy P3 of Gravesham Local Plan First Review (1994).

13. Prior to the first use of the development hereby approved, the floodlighting shall be implemented in accordance with the lighting design scheme dated 30/04/2025 Report Ref G218481. This scheme shall be implemented in accordance with the Institute of Lighting Professionals "Guidance Note 01/21: Guidance notes for the reduction of obtrusive light" and other industry accepted standards. The floodlighting shall be retained in accordance with the approved details and there shall be no other lighting of the external areas of the site.

Reason: To minimise light spill and to protect adjacent habitats and wildlife from impacts from lighting and in accordance with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (2014).

14. Prior to the first use of the development hereby approved, a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to, and approved in writing, by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014).

15. The development hereby permitted shall only operate between the hours of 08:00 and 21.30 on Mondays to Fridays, 09.00 and 21.30 on Saturdays and 09.00 and 18.00 on Sundays and Bank Holidays.

Reason: In the interests of residential amenity and in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

16. There shall be no amplified music or voices from the approved pitch or multi-use games area at any time.

Reason: To protect the residential amenity of surrounding occupiers and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

17. The floodlighting hereby permitted shall only be used, when required, between the hours of 16.00 to 21.00 on Mondays to Saturdays and 16.00 to 17.30 on Sundays and Bank Holidays. The floodlighting installation shall include automatic cut-off switches to ensure that the approved floodlights are turned off completely outside of these times.

Reason: To protect the residential amenity of surrounding occupiers and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

18. The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the Local Planning Authority (LPA) should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Reason: To prevent harm to human health and pollution of the environment and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

19. No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from, unacceptable levels of water pollution and in accordance with Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy (2014).

20. The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Statement & Metric Assessment, for Northfleet School for Girls, Gravesend, Kent, dated December 2024 and prepared by Middlemarch Environmental Ltd.

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application and in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

INFORMATIVES:-

1 STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION-MAKING

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 39 of the National Planning Policy Framework (NPPF) 2024, the Local Planning Authority has approached the assessment and determination of this application in a positive and creative way and, where appropriate, has worked pro-actively with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area, and that is in accordance with the Development Plan for the area.

2 BUILDING REGULATIONS AND PARTY WALL ACT

This decision DOES NOT imply any consent which may be required under the Building Regulations or under any other enactment or provision. Nor does it override any private rights which any person may have relating to the land affected by this decision, including the provisions of the Party Wall etc. Act 1996.

3 DEVIATION FROM APPROVED PLANS

It is possible that any proposed deviation from the approved plans could be classed as a 'material' change requiring a further application/permission. In the event that any change is proposed, applicants are advised to seek advice from the Local Planning Authority [as proceeding without the necessary permissions could nullify this permission].

4 BIODIVERSITY NET GAIN

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Gravesham Borough Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed below.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements listed below are considered to apply.

In summary: Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun (the overall plan).

Statutory exemptions and transitional arrangements in respect of the biodiversity gain condition:

1. The application for planning permission was made before 12 February 2024.
2. The planning permission relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.
3. The planning permission was granted on an application made under section 73 of the Town and Country Planning Act 1990 and
 - (i) the original planning permission to which the section 73 planning permission relates* was granted before 12 February 2024; or
 - (ii) the application for the original planning permission* to which the section 73 planning permission relates was made before 12 February 2024.
4. The permission which has been granted is for development which is exempt being:
 - 4.1 Development which is not 'major development' (within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015) where:
 - i) the application for planning permission was made before 2 April 2024;
 - ii) planning permission is granted which has effect before 2 April 2024; or
 - iii) planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 where the original permission to which the section 73 permission relates* was exempt by virtue of (i) or (ii).
 - 4.2 Development below the de minimis threshold, meaning development which:
 - i) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
 - ii) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).
 - 4.3 Development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. A "householder application" means an application for planning permission for development for an existing dwellinghouse, or development within the curtilage of such a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse which is not an application for change of use or an application to change the number of dwellings in a building.
 - 4.4 Development of a biodiversity gain site, meaning development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the Biodiversity Gain Planning condition which applies in relation to another development, (no account is to be taken of any facility for the public to access or to use the site for educational or recreational purposes, if that access or use is permitted without the payment of a fee).
 - 4.5 Self and Custom Build Development, meaning development which:
 - i) consists of no more than 9 dwellings;
 - ii) is carried out on a site which has an area no larger than 0.5 hectares; and
 - iii) consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

4.5 Development forming part of, or ancillary to, the high speed railway transport network (High Speed 2) comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.

* "original planning permission means the permission to which the section 73 planning permission relates" means a planning permission which is the first in a sequence of two or more planning permissions, where the second and any subsequent planning permissions are section 73 planning permissions.

Irreplaceable habitat:

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

The effect of section 73D of the Town and Country Planning Act 1990:

If planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 (application to develop land without compliance with conditions previously attached) and a Biodiversity Gain Plan was approved in relation to the previous planning permission ("the earlier Biodiversity Gain Plan") there are circumstances when the earlier Biodiversity Gain Plan is regarded as approved for the purpose of discharging the biodiversity gain condition subject to which the section 73 planning permission is granted.

Those circumstances are that the conditions subject to which the section 73 permission is granted:

- i) do not affect the post-development value of the onsite habitat as specified in the earlier Biodiversity Gain Plan, and
- ii) in the case of planning permission for a development where all or any part of the onsite habitat is irreplaceable habitat the conditions do not change the effect of the development on the biodiversity of that onsite habitat (including any arrangements made to compensate for any such effect) as specified in the earlier Biodiversity Gain Plan.

5 INFORMATION FROM THE KCC BIODIVERSITY OFFICER

The ecologist has suggested incorporating plant species to attract night flying insects, and this can be included within the planting plans for the enhancement measures, to be submitted via the biodiversity enhancement planning condition.

As habitat creation may be required offsite, we direct the applicant towards the Kent Biodiversity Net Gain Site Register¹ available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

Off-site gains/the purchase of biodiversity units will need to be subject to a deed of conservation covenants or Section 106 (as appropriate). Off-site gains must be registered² after determination. Section 106 agreement templates are available on the Planning Advisory Service website³. We have provided more information regarding the use of off-site gains in appendix A (attached).

The applicant should submit a biodiversity gain plan form⁴ along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered.

1] <https://www.makingspacefornaturekent.org.uk/bng/kent-biodiversity-net-gain-site-register/>

2 Register a biodiversity gain site - GOV.UK (www.gov.uk)

3 PAS Biodiversity Net Gain (BNG) Legal Agreement and Planning Condition Templates | Local Government Association

4 <https://www.gov.uk/government/publications/biodiversity-gain-plan>

6 INFORMATION FROM KCC FLOOD & WATER MANAGEMENT

Kent County Council as Lead Local Flood Authority (LLFA) reviewed the revised Drainage Strategy prepared by JPP Consulting Ltd (August 2025) and are generally satisfied with the design set out. Additional items recommended include:

- o Setting the Summer and Winter CV value of 1 within the modelling. This is because of the contributing sports pitch being 100% impermeable.
- o Further details regarding the barrier arrangement, including its height and material. It is understood that a barrier is proposed around the pitch to contain exceedance volumes identified in the modelling for the climate-adjusted 100-year return period scenario.

The LLFA are open to receive this additional information through a planning condition.

7 INFORMATION FROM SOUTHERN WATER

No new Soakaways should be located within 5 metres of a public or adoptable gravity sewer, rising main or water main.

No Soakaways should be connected to the public surface water sewer

Hierarchy of Building Regulations H3 for disposal of surface water - not yet provided documentation proving compliance

If the applicant has not already provided documentation demonstrating compliance with the surface water hierarchy reflected in part H3 of the Building Regulations, as shown below, we will require this to be provided where surface water is being considered for discharge to our network. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.

- Reuse
- Infiltration
- Watercourse
- Storm Sewer
- Combined Sewer

Guidance on Building Regulations is here: <https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h>

We would like to engage with you on the design for disposal of surface water for this development at the earliest opportunity and we recommend that civil engineers and landscape architects work together and with Southern Water. In many cases this may negate or reduce the need for network reinforcement and allow earlier completion of the development.

Where a surface water connection to the foul or combined sewer is being considered, this should be agreed by the Lead Local Flood Authority, in consultation with Southern Water.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here: <https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>
<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It

is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

8 INFORMATION FROM THE ENVIRONMENT AGENCY

Advice to the Applicant:

Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £115 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available here [Planning and marine licence advice: standard terms for our charges - GOV.UK](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk

Land contamination: risk management and good practice

We recommend that the applicant should:

- o Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- o Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- o Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- o Refer to the contaminated land pages on gov.uk for more information

Drainage and infiltration:

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Waste on-site:

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- o excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- o treated materials can be transferred between sites as part of a hub and cluster project
- o some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- o The position statement on the Definition of Waste: Development Industry Code of Practice
- o The waste management page on GOV.UK

Waste to be taken off-site:

Waste soil that must be disposed of site is subject to waste management legislation. You must ensure that handling, transport, treatment and disposal of the waste is in line with the legislation, which includes:

- o Duty of Care Regulations 1991
- o Hazardous Waste (England and Wales) Regulations 2005
- o Environmental Permitting (England and Wales) Regulations 2016
- o The Waste (England and Wales) Regulations 2011

Developers should ensure that all wastes are adequately assessed and characterised in line with 'Technical Guidance WM3-Guidance on the classification and assessment of waste' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Waste assessment and classification:

It is the producer's legal responsibility to correctly classify a waste prior to it being moved off site. The procedure of which is described in the WM3 Guidance on the classification and assessment of waste:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719394/Waste-classification-technical-guidance-WM3.pdf

Under Section 34 of the Environmental Protection Act 1990 (the Waste Duty of Care), you are required to ensure the description of the waste you produce is accurate and contains all the information you are in a position to provide. This includes chemical analysis.

9 INFORMATION FROM KCC HIGHWAYS & TRANSPORTATION

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway. Some

of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

10 INFORMATION FROM KENT POLICE DESIGNING OUT CRIME TEAM

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. We recommend perimeter, boundary and divisional treatments must be a minimum of 2m high around the synthetic turf pitch. In addition to this, the gates must be secure, which are lockable from both sides, located flush to the front building line to optimise surveillance.
2. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting

Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution.

3. CCTV is advised, especially at entry points and other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.

4. Defined pedestrian routes to/ from the building are recommended to improve safety.

5. Adequate access control is required for the storage container.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

11 WORKS OF CONSTRUCTION

Hours of work of construction site plant, equipment and machinery, should be restricted to not earlier than 7.00 a.m. and not later than 6.00 p.m. weekdays and Saturday working should be restricted to not earlier than 8.00a.m. and not later than 1.00 p.m. No work shall be carried out on Sundays, Bank or Public Holidays.

i. Suitable sound attenuation shall be used at all times in respect of all plant, machinery and equipment in operation on site in order to aid prevention of noise nuisance. Compliance with BS 5228: Part 1: 1984 and subsequent amendments regarding the use of equipment on site will be required in appropriate cases.

ii. A suitable method of control shall be used in order to aid prevention of dust nuisance arising from work activities on site.

iii. Burning of waste materials shall not be carried out on site. Such materials are to be stored in a suitable receptacle, as far from residential accommodation as reasonably practicable, pending disposal off site.

iv. Adequate arrangements shall be made to remove all waste material from the site on a regular basis and to dispose of it at a suitably licensed waste disposal site.

12 REASON FOR IMPOSITION OF PRE-COMMENCEMENT CONDITIONS

Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority is satisfied that the requirements of condition 3 (sustainable surface water drainage scheme) is so fundamental to the development permitted, that such details must be submitted prior to the works commencing on site. The applicant is in agreement with the imposition of this condition.

Dated: 5 December 2025

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Shazad Ghani
MPhil, MA, BA (Hons)
Head of Planning
Planning Service

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## **NOTIFICATION TO APPLICANT**

### **APPEALS TO THE SECRETARY OF STATE**

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under Section 78 of the Town and Country Planning Act 1990.
- If this is a **householder application\*** which has been refused and you want to appeal against your Local Planning Authority's decision then you must do so within **12 weeks of the date of this notice**.
- For all other applications, refused or permitted, if you want to appeal against your Local Planning Authority's decision then you must do so within 6 months of the date of this notice.
- **For further information regarding Appeals and to make an application please click the relevant link:**  
<https://www.gov.uk/appeal-householder-planning-decision>  
<https://www.gov.uk/appeal-planning-decision>
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based their decision on a direction given by him.

#### **\*Householder applications**

These are:

- (a) applications for planning permission for development of an existing dwellinghouse, or development within the curtilage of such a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse, or
- (b) an application for any consent, agreement or approval required by or under a planning permission, development order or local development order in relation to such development

but does **not** include –

- (i) an application for change of use;
- (ii) an application to change the number of dwellings in a building.

### **PURCHASE NOTICES**

If either the Local Planning Authority or the Secretary of State for the Environment refuses permission to develop land or grants it subject to conditions, the owner may claim that he/she can neither put the land to a reasonably beneficial use in its existing state nor can he/she render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is

situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.