

Delegated Report

Planning Application

Planning Application No: 20250028

Location: Northfleet School For Girls Hall Road Northfleet Gravesend

Description: Construction of floodlit synthetic turf pitch with perimeter 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.

Applicant: Mrs Kacey Leigh, Northfleet School For Girls

Site Visit Date: 13 November 2025

Submitted Documents/Plans

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.

Superseded Documents/Plans

~~Application for Planning Permission form received 15 January 2025;~~
~~Drawing no. 24-004(G-218481) 03 Rev. B Proposed block plan received 08 May 2025;~~
~~Drawing no. 24-004(G-218481) 03 Rev. A Proposed block plan received 15 January 2025;~~
~~Drawing no. 24-004(G-218481) 03 Rev. C Proposed block plan received 18 September 2025;~~
~~Drawing no. 24-004(G-218481) 04 Proposed pitch layout;~~
~~Drawing no. 24-004(G-218481) 05 Proposed elevations;~~
~~Drawing no. 24-004(G-218481) 06 Lighting overspill;~~
~~Drawing no. 24-004(G-218481) 10A Existing and proposed summer markings layouts received 15 January 2025;~~
~~Drawing no. 24-004(G-218481) 12A Existing and proposed winter markings layouts received 15 January 2025;~~
~~Drainage Strategy August 2024 Rev. 0;~~
~~Drainage Strategy July 2025 Rev. A; and~~
~~Lighting Details 30 October 2024.~~

Procedural Issues

Following the receipt of consultation responses, the applicant was requested to provide additional/amended details relating to the proposed lighting, noise and drainage. These details were subject to additional publicity and appropriate consultation.

Following comments from a local resident, the applicant was requested to provide an amended planning application form. The original form included the occupier of no. 141 Hall Road as an owner of the application site and showed that notice had been served on them, which was an error. The actual owner, on which notice had been served, was the Northfleet Schools Cooperative Trust.

Following a request from the case officer, the proposed hours of operation were reduced. Due to this change being a minor amendment that restricts the extent of the use, no additional publicity or consultation was undertaken.

For clarity and completeness, various drawings were amended to illustrate that the floodlighting layout for the proposed pitch was amended from six columns to eight.

Relevant Planning History

Reference	Description	Decision	Decision Date
20250990	Application for the approval of condition 3 (Habitat Management and Monitoring Plan) and condition 4 (Biodiversity Gain Plan) attached to planning reference number 20240438.	Details Approved	26.11.2025
20240438	Erection of a single storey modular teaching and drama block.	Permitted	28.02.2025
20210709	KCC Consultation KCC/GR/0109/2021- Temporary stationing and use of three modular buildings for a period of six months.	Observations Sent	15.06.2021
20191045	KCC Consultation KCC/GR/0176/2019 - Erection of a new two storey teaching block and an activity studio extension to existing sports block.	Observations Sent	25.10.2019
20180597	Prior notification for the proposed installation of 677 x 270w Solar Photovoltaics Panels on the roofs under Schedule 2, Class J, Part 14 of the Town and Country	Prior approval granted	31.08.2018

	Planning (General Permitted Development) Order 2015.		
20160019	Application under Regulation 3 for the re-establishment of school farm to include wildfowl and animals. Inclusion of polytunnel for horticulture. KCC GRANTED PERMISSION 11/2/16 (CONDITIONS)	Observations Sent	02.02.2016
20150214	Display of varying size banner advertisements on school fencing promoting school based events.	Consent for Advert	23.06.2015
20110330	Application under Regulation 3 for first floor extension above existing food technology rooms to provide two additional classrooms. KCC GRANTED PERMISSION 22.6.2011 (CONDITIONS)	Observations Sent	08.06.2011
20110054	Application under Regulation 3 for retention of a mobile classroom unit and alterations to landscaping. KCC GRANTED PERMISSION 7.4.2011 (CONDITIONS)	Observations Sent	02.03.2011
20080827	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the renewal of planning permission for three mobile classrooms. KCC GRANTED TEMPORARY PERMISSION 22.10.08 (CONDITIONS)	Observations Sent	22.10.2008
20080229	Joint application under Regulation 3 of the Town and Country Planning General Regulations 1992 for redevelopment of the school involving the demolition of existing buildings, refurbishment and extension of retained buildings and the construction of new buildings together with revised access arrangements on to Hall Road, new car parking, hard play area, landscaping and the provision of temporary accommodation during construction. KCC GRANTED PERMISSION 4.8.08 (CONDITIONS)	Observations Sent	04.08.2008

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC7 – Other Archaeological Sites

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since

the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 8 – Promoting Healthy and Safe Communities
- Section 9 – Promoting Sustainable Transport
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

GBC Environmental Protection Team (Regulatory Services)

Response received 07 October 2025

Most of the recent information submitted is not relevant to Environmental Protection. However, the updated Proposed Block Plan (24-0004(G-218481)03 is noted and this shows the location of the 3m high acoustic fence. It is advised that the condition recommended in the response dated 9th June 2025 is still attached to any permission as this will ensure that the correct type of acoustic fencing/barrier is installed in order to provide the relevant sound absorption/insulation.

Response received 10 June 2025

The submission of the noise impact assessment and revised lighting information are noted, and the following comments are made:

Noise:

Appropriate noise measurements were undertaken to cover both weekdays and weekend periods. Noise levels were used from rugby, football and hockey being played on artificial grass pitches and at different location on/around the pitch. Hockey is not expected to be played on the pitch as it's not suitable for that use. The results were then modelled to create a noise map of the site. The report concludes that generally noise from players, balls, spectators etc will be such that there is unlikely to be a significant impact at the nearest dwellings. However, the use of whistles could result in problems. To address this the report suggests a 'no whistle' policy during community use in the evenings after the school uses has finished. The report does not make any comments on this policy being extended into the weekend? As an alternative if this is not feasible, a 3 metre acoustic barrier is advised along the norther boundary and overlapping a third of the way down the east and west sides.

In my opinion, the latter is the preferred option as a 'no whistle' policy may be hard to enforce once the school has closed.

The use of the AGP and MUGA being used simultaneously has also been looked at and modelled. Apart from some instances later in the evening, the use together is unlikely to result in a significant impact.

A Noise Management Plan is also recommended.

Lighting:

A revised lighting assessment dated has been submitted. The design of the lighting has been changed from 6 poles to 8 poles. This results in the overall light level on the pitches/courts being reduced slightly and lux level around the pitches are lower and at a more acceptable level. Based on this revised report, this is acceptable. However, it is advised that an automatic timer is fitter to the lighting controls to ensure the lights

are switched off on time.

The hours of use are still considered as being slightly excessive, particularly the late evening finish time and the weekend use. There will be a considerable upturn in use of the area compared to how it currently is and even with controls in place, the use could still be problematic simply by its intensity and regularity in use.

It is suggested that the following hours may be considered as more suitable.

Monday to Friday – 08:00 to 21.30

Saturday - 09.00 to 21.30

Sunday – 09.00 to 18.00

The following conditions are recommended in addition to the watching brief condition recommended previously:

Noise Mitigation

Full details of the acoustic noise barrier as given in the per the 'Noise Impact Assessment' by Acoustic Consultants Ltd dated 04/04/2025 (Report Ref: 11302/CP Rev A) shall be submitted for approval. The noise barrier shall be erected in accordance with the agreed details prior to any use commencing.

There shall be no amplified music or voice from the AGP or MUGA at any time.

Noise Management Plan

A Noise Management Plan shall be submitted for approval prior to any use commencing. 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

Floodlighting Lighting Control Of Timing

The floodlighting shall be fitted with a timer control system to ensure that the lighting system is switched off between the hours of <insert time> and <insert time>.

External Illumination

Prior to the first use/occupation of the development hereby approved, floodlighting shall be implemented in accordance with the lighting design scheme dated 30/04/2025 Report Ref G218481 submitted with the application.

This scheme shall be implemented 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 scheme shall be retained in accordance with the approved details. There shall be no other lighting of the external areas of the site unless agreed by the LPA.

Response received 11 February 2025

There are a number of concerns regarding this application and the following comments are made.

Noise:

Although the proposed area is already in sports use, this is for summer athletics/general play and is on a grassed area. The introduction of a synthetic pitch in this area will result in the use being considerably more, as the pitch use will not be restricted by bad weather/waterlogging etc. Synthetic pitches extend outside play and sports hours which can result in nearby neighbours being subjected to noise for much longer periods of time than with a grass pitch/area. The D & A highlights this by stating that there is

currently 'limited use of the playing fields in the winter months but the synthetic pitch will enable this.

The D & A also advises that community groups, sports clubs/groups and after school clubs will also use the synthetic pitch and full size 11v11 football will be able to take place – so a marked extension in use over what currently exists.

The proposed hours of use 08:00 to 22:00 7 days a week is considered excessive bearing in mind the proximity to nearby residential premises and the proposed extended use. It assumed that these hours are for both the existing MUGA and the proposed synthetic pitch? In addition, the synthetic floodlit pitch and the floodlights on the existing MUGA are likely to be used for the whole year rather than just the academic term times – again adding to noise experienced by residents nearby. The provision of the floodlight will allow for the synthetic pitch and also the existing MUGA to be used for much longer hours particularly during the autumn and winter when daylight hours are less.

A noise impact assessment (NIA) has not been submitted with the application and this is required prior to determination of the application in order to be able to fully assess the impact of the proposal on the residential premises in the area. The NIA needs to be undertaken by a reputable acoustic consultant, and it will need to cover both the proposed synthetic pitch and the extended hours/additional use of the existing MUGA due to the installation of floodlights. It should include (but not be limited to if other factors come into consideration) the following:

- Background noise measurements taken over a reasonable period of time (not less than 1 hour) throughout the times the synthetic pitch intended to be used (this should include evening and weekends).
- Noise measurements/levels must be taken at the nearest noise sensitive premises (ie houses).
- A comparison of the predicted increase in noise levels as a result of the synthetic pitch (this should include noise from the players, balls being kicked, bounced and also reverberating against any fencing, whistles being blown, use of any amplification/loud halers etc, verbal instructions being given etc, plus spectator noise if matches are to take place). The acoustics consultant will be able to find reference to noise levels from various sports scenarios online from other noise reports, guidance etc.
- Noise from ball stop and perimeter fencing should be considered.
- Reference must be made to the type of sports activity (and age group) intending to take place as this may have implications on the noise climate/impact. Also, as community use is intended, this must be considered.
- Reference should be made to the Sports England Guidance on Artificial Grass Pitch Acoustics and the NIA undertaken in accordance with this guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/artificial-grass-pitches-acoustics-planning-implications>

Lighting:

The floodlighting for both the proposed synthetic pitch and the existing MUGA has been designed in accordance with the relevant guidance for an E3 Environmental Zone. The lighting iso-lux contours show that the lux levels fall to 2lux and below at the school boundary. This is compliant with the ILP (and other) guidance.

However, as this type of lighting is new to the area, it may still be considered unreasonable by residents, as although the light may not spill into their properties, they will be able to see it from their windows and it will light up the area over and above the existing situation. In this respect, it is advised that the lighting is designed to be as minimal as possible. It should be designed for the appropriate class of sport and type of sport to be played on the surfaces. The new synthetic pitch has been designed with an average level of 200 lux and the MUGA with an average of 400 lux. For this type of facility, lighting levels should be designed to Lighting Class III (as per CIBSE Lighting Guide 4: Sports Lighting) or 'Community' use as per the Sport England 'Artificial Sports Lighting' guidance. This gives appropriate levels of lighting for general training, school sports, local club etc competitions and recreational activities. Higher levels of lighting are only needed for Class I and Class II levels of sport/competitions which include regional/national competitive sports, higher level training etc.

For the MUGA, the lux levels are in accordance with the recommended levels for school/local club etc tennis and netball. However, the above guidance suggests that for Class III football, average lux levels only need to be 75 lux (200 lux is for Class II). With this in mind, it is therefore recommended that the applicant is asked to review their lighting requirements to ensure that the levels are in line with the required use.

Contaminated Land:

The 'Desk Study Review' and 'Site Investigation Report' by JPP dated March 2024 (report Ref: R-SI-27677-01-00) has been reviewed and includes a basic contamination assessment. Laboratory analysis of soil samples did not reveal any exceedances of the relevant guideline values for any contaminants. Therefore, no remediation works are required. A watching brief is recommended in order to address any unforeseen contamination discovered during the groundworks. The following condition is therefore recommended to cover this:

Watching Brief

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 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.

GBC Leisure & Resilience Manager (Communities)

Policy CS13 and the NPPF recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

Based on all the assessment data currently available; including the Gravesham Playing Pitch Strategy compiled by Knight Kavanagh & Page in 2016, the Kent FA's 2019 Local Football Facility Plan for Gravesham and the updated Indoor Leisure Feasibility Study 2022, there is particular shortage in the borough of artificial pitches (3GFTP's) and of junior/youth grass pitches leading to a displacement of local teams, overplaying of existing pitches and a lack of accessible and secured community use to meet future demands in the borough.

In order to satisfy demand, the 2016 PPS identified that there is a need for four community available full size 3G pitches in the borough; the development above will assist in alleviating some of this shortfall, enabling football to be played all year round and could cater for an average of 1,200 participants per week (figures provided by the Kent FA LFP for Gravesham); therefore the Leisure Services Team are supportive of the above application.

KCC Biodiversity Officer

NB The following relate to all responses received;

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>

Response received 09 October 2025

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

We are satisfied that the BNG baseline is representative. With the current proposals this site will result in a BNG net loss, and 1.02 habitat units will be required.

We do not consider the on-site habitat creation as significant as the only qualifying habitat is 0.6 habitat units of urban trees.

Protected Species and Habitats:

Habitat is present that could provide suitable opportunities for protected species. The sports field is predominated modified grassland with dense scrub and some hardstanding, and it is located adjacent to woodland.

The Preliminary ecological appraisal (PEA) states that no trees will be lost to the development, and an arboricultural impact assessment has been provided that details root protection areas. Foraging and commuting opportunities for bats are present on site, with linkages to adjacent woodland, and the PEA recommended that further surveys are conducted with a bat activity survey (nighttime walkover survey) to establish impact to bats. A lighting assessment and light spill plans have been provided. The lighting for the majority of the site's boundaries is under 1 lux and the tennis court, due to higher lighting requirements, has higher light levels to the strip of vegetation to the east, with approximately 3 lux at certain points.

The further bat surveys have now been completed and Common Pipistrelle, Noctule and Leisler's bat activity were recorded, with Common Pipistrelle noted likely using the boundary vegetation for foraging and commuting. We have reviewed the lighting information in line with the new bat survey information. We are satisfied that although all bats are light sensitive, the recorded species are more light tolerant species and low numbers were recorded.

We recommend lighting curfews, in line with other similar facilities, that lighting will be turned off at 10pm at the latest, as suggested in the Design and Access statement, with lighting turned off when not in use. With these measures in place we are satisfied there will not be a significant impact on the bat population from the lighting.

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, noted further below.

Some vegetation removal is also proposed to northern and eastern elevations of the pitch fencing and checks by a suitably qualified person will be conducted for birds prior to any removal. We suggest also precautionary measures for bats for this vegetation removal, minimising pruning where possible, and this is to be included within a precautionary works method statement (PWMS).

Great crested newts (GCN) have been considered within the PEA by the ecologist as 2 ponds are located within 250m but in isolated urban ponds. Foraging and shelter opportunities exist within the boundary vegetation for GCN but the majority of the site is a sports field, which is shown in aerial imagery to be regularly maintained, and therefore we consider that reasonable avoidance measures proposed in the PEA can be included within the PWMS.

No signs of badger were reported but as they are a mobile species and as there is an adjacent woodland. Precautionary measures of a preconstruction surveys are proposed. Precautionary measures are also proposed for reptiles, breeding birds and hedgehogs and these also can be included within the PWMS. Suggested wording is provided below.

Suggested Precaution works method statement wording

From commencement of works (including site clearance), precautionary working methods are required regarding badger, bats, breeding birds, great crested newts and hedgehog. We advise that these are secured by condition. Suggested wording:

From 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

Lighting:

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to scrub boundaries and trees on the site.

With the updated information discussed above, we consider that the lighting arrangements are appropriate and suggest the following condition wording.

A sensitive lighting scheme will be implemented as detailed within in the lighting scheme report, Signify, Ref G218481, dated 30/4/25. No changes must be implemented unless agreed in writing with the LPA.

Reason: to minimise light spill and to protect adjacent habitats and wildlife from impacts from lighting

Biodiversity Net Gain:

A baseline assessment and BNG metric have been provided. The baseline assessment has been provided with a habitat map, and we are satisfied that this is representative.

The post development habitats have been provided, with developed land sealed surface, modified grassland and urban trees created. As there is limited opportunity for habitat creation within the area due to the sports use there is a BNG deficit of -20.16%, and a unit deficit of 1.02 habitat units.

We previously noted there is a bund being created with spoil and queried if this could be utilised further for post development habitats to reduce the unit deficit. It has been confirmed that due to the school use that recreational impacts will be present and other habitat types would not be achievable in this location.

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.

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.o dt. 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.

Suggested Condition Wording:

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, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

Enhancements:

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, we advise that an enhancement plan is provided that includes the actions proposed and the ownership and responsibilities for future management and a proposed condition wording is further below.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes, native tree/shrub planting, inclusion of plants to attract night flying insects, sowing of an appropriate wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of 'hedgehog highways' (13×13cm gaps in closed board fencing) and/or creation of bug hotels/bee bricks for invertebrates.

Suggested Ecological Enhancement condition:

Within three months of works commencement, a detailed plan(s) showing how the development will enhance biodiversity, will 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, and integrated durable bat and bird boxes aimed at species of conservation concern. The approved measures will be implemented and retained thereafter.

Response received 22 May 2025

We have reviewed the further information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required:

- Bat nighttime walkover and static surveys and any proposed mitigation measures

We are satisfied that the BNG baseline is representative. With the current proposals this site will result in a BNG net loss, and 1.02 habitat units will be required.

Protected Species and Habitats:

Habitat is present that could provide suitable opportunities for protected species. The sports field is predominated modified grassland with dense scrub and some hardstanding, and it is located adjacent to woodland.

The Preliminary ecological appraisal (PEA) states that no trees will be lost to the development, and an arboricultural impact assessment has been provided that details root protection areas. Foraging and commuting opportunities for bats are present on site, with linkages to adjacent woodland, and the PEA recommends that further surveys are conducted with a bat activity survey (nighttime walkover survey) to establish impact to bats. A lighting assessment and light spill plans have been provided and further changes to the lighting scheme have reduced the light spill to reduce any impacts to bats. The applicant

has requested that with this change whether the need for bat surveys can be reduced. It is recommended that light spill is equal or below to 1 lux on vegetation used by foraging bats and with the lighting changes light spill has been reduced to 1.13 Lux which we consider acceptable. The suggested walkover surveys augmented by static Bat detectors during May and June are an acceptable alternative combined with the precautionary lighting approach. This will enable an understanding of the species and presence of bats on the site. We await this information before providing further comments.

Some vegetation removal is also proposed to northern and eastern elevations of the pitch fencing and checks by a suitably qualified person will be conducted for birds prior to any removal. We suggest this also includes precautionary measures for bats for this vegetation removal, minimising pruning where possible, and this can be included within a precautionary works method statement (PWMS).

Great crested newts (GCN) have been considered within the PEA by the ecologist as 2 ponds are located within 250m but in isolated urban ponds. Foraging and shelter opportunities exist within the boundary vegetation for GCN but the majority of the site is a sports field, which is shown in aerial imagery to be regularly maintained, and therefore we consider that reasonable avoidance measures proposed in the PEA can be included within the PWMS, detailed in appendix A.

No signs of badger were reported but as they are a mobile species and as there is an adjacent woodland. Precautionary measures of preconstruction surveys are proposed to be included within the CEMP. Precautionary measures are also proposed for reptiles, breeding birds and hedgehogs and these also can be included within the PWMS. Suggested PWMS wording is provided in appendix A.

Lighting:

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to scrub boundaries and trees on the site.

The lighting assessment and the design and access statement has discussed controlling light spill to nearby residential properties and upward light spill, but not on the adjacent vegetation where protected species may be present. Louvres have been suggested and the revised plans change a 6 column scheme to an 8 column scheme which allows for greater control over the light spill, which we approve of.

As detailed above further surveys have been proposed in the PEA to understand bat presence within the site.

Biodiversity Net Gain:

A baseline assessment and BNG metric have been provided. The baseline assessment has been provided with a habitat map, and we are satisfied that this is representative.

The post development habitats have been provided, with developed land sealed surface, modified grassland and urban trees created. As there is limited opportunity for habitat creation within the area due to the sports use there is a BNG deficit of -20.16%, and a unit deficit of 1.02 habitat units.

We note there is a bund being created with spoil and this is not considered in post development habitats. We suggest that if appropriate this could be utilised to provide further habitat that could reduce the deficit.

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.

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs

for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.o dt. 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.

Enhancements:

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, we advise that an enhancement plan is provided that includes the actions proposed and the ownership and responsibilities for future management and a proposed condition wording is provided in appendix a.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes, native tree/shrub planting, sowing of an appropriate wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of 'hedgehog highways' (13×13cm gaps in closed board fencing) and/or creation of bug hotels/bee bricks for invertebrates.

Response received 12 March 2025

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required:

- Bat nighttime walkover surveys and any proposed mitigation measures
- Further information on lighting to the adjacent vegetation, to consider protected species.

We are satisfied that the BNG baseline is representative. With the current proposals this site will result in a BNG net loss, and 1.02 habitat units will be required.

Protected Species and Habitats:

Habitat is present that could provide suitable opportunities for protected species. The sports field is predominated modified grassland with dense scrub and some hardstanding, and it is located adjacent to woodland.

The Preliminary ecological appraisal (PEA) states that no trees will be lost to the development, and an arboricultural impact assessment has been provided that details root protection areas. Foraging and commuting opportunities for bats are present on site, with linkages to adjacent woodland, and the PEA recommends that further surveys are conducted with a bat activity survey (nighttime walkover survey) to establish impact to bats. A lighting assessment and light spill plans have been provided, discussed further below.

Great crested newts (GCN) have been considered within the PEA by the ecologist as 2 ponds are located within 250m but in isolated urban ponds. Foraging and shelter opportunities exist within the boundary vegetation for GCN but the majority of the site is a sports field, which is shown in aerial imagery to be regularly maintained, and therefore we consider that reasonable avoidance measures proposed in the PEA can be included within the Construction environmental management plan (CEMP), detailed below.

No signs of badger were reported but as they are a mobile species and as there is an adjacent woodland. Precautionary measures of preconstruction surveys are proposed to be included within the CEMP. Precautionary measures are also proposed for reptiles, breeding birds and hedgehogs and these also can be included within the CEMP.

Construction Environmental Management Plan:

We suggest that the below wording is included as a condition for a Construction Environmental Management Plan (CEMP – biodiversity) if planning permission is granted. This will mitigate for impacts to biodiversity and help ensure compliance with relevant legislation. The plan will include mitigation as

outlined in the PEA. We can provide condition wording once the further information is provided.

Lighting:

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to scrub boundaries and trees on the site.

The lighting assessment and the design and access statement has discussed controlling light spill to nearby residential properties and upward light spill, but not on the adjacent vegetation where protected species may be present. Louvres have been suggested but no use of cowls and shades have been proposed to restrict light spill on to the adjacent vegetation, where protected species may be present, and bats could be using this area for foraging and commuting. Further bats surveys have been proposed in the PEA to understand bat presence within the site.

We therefore request further information to show the lighting of vegetation has been considered and mitigated. A lighting condition will be required with the following information

- Plan of the whole site showing location of all external lighting, light fitting type (downward facing) and light spill evaluated in relation to adjacent vegetation and protected species
 - Operational hours and curfew times
 - On a motion sensor (where possible)
 - Follow the recommendations within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'
- <https://www.bats.org.uk/news/2023/08/bats-and-artificial-lighting-at-night-ilp-guidance-note-update-released>

Biodiversity Net Gain:

A baseline assessment and BNG metric have been provided. The baseline assessment has been provided with a habitat map, and we are satisfied that this is representative.

The post development habitats have been provided, with developed land sealed surface, modified grassland and urban trees created. As there is limited opportunity for habitat creation within the area due to the sports use there is a BNG deficit of -20.16%, and a unit deficit of 1.02 habitat units.

We note there is a bund being created with spoil and this is not considered in post development habitats. We suggest that if appropriate this could be utilised to provide further habitat that could reduce the deficit.

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.

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.pdf. 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.

Enhancements:

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, we advise that

an enhancement plan is provided that includes the actions proposed and the ownership and responsibilities for future management and a condition wording can be provided.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes, native tree/shrub planting, sowing of an appropriate wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of 'hedgehog highways' (13×13cm gaps in closed board fencing) and/or creation of bug hotels/bee bricks for invertebrates.

KCC Highways & Transportation

It is unlikely that this proposal will increase traffic generation to the site and that there is adequate parking provision already available on the school site. The submission of a Travel and Parking Management Plan as stated in the Design and Access Statement will ensure that the traffic generation and parking demand is quantified and kept to a minimum with attendees encouraged to utilise sustainable transport.

I therefore raise no objection to this application on highway grounds provided a Travel and Parking Plan is submitted to and approved by the LPA prior to the facility first comes into use.

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.

KCC Flood & Water Management

Response received 09 October 2025

Kent County Council as Lead Local Flood Authority 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:

- Setting the Summer and Winter CV value of 1 within the modelling. This is because of the contributing sports pitch being 100% impermeable.
- 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 now as part of the full application or through a condition if required. Should a condition be sought, we would request for the following detailed design condition, along with our verification report condition to be attached:

Condition:

Prior to commencement, 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 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/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved 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 to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

Response received 14 August 2025

Kent County Council as Lead Local Flood Authority have reviewed the revised Drainage Strategy prepared by JPP (dated July 2025) and have the following comments:

Surface water from the proposed AGP will be managed via infiltration techniques, primarily through a geocellular soakaway (volume 248.6m³) located in the north-west corner of the site, designed using conservative lowest infiltration rate of 1.11 x 10⁻⁵ m/s. A permeable sub-base will provide initial attenuation, treatment, and flow restriction to 2.0 l/s before discharging into the soakaway. To mitigate the identified risk of chalk dissolution, both the pitch and soakaway will be appropriately lined, and a minimum separation distance of 10 metres will be maintained from all foundations, structures, and site boundaries.

1. The Ground Investigation conducted by JPP G&E identified chalk dissolution risk. In accordance with CIRIA Report C574 Engineering in Chalk, soakaways should be located 'at least 10 metres from foundations, structures (including the pitch), and boundaries.' It is noted that the drainage drawing in Appendix F currently shows the soakaway positioned beneath the proposed new pavilion. Given the consultant's recommendation for a 10m separation, we expect the design to be revised accordingly.
2. As previously stated in our earlier response, the current calculations use the FEH 1999 dataset. This dataset is no longer accepted by Kent County Council. We request that the latest FEH 2022 dataset is used (2013 is acceptable but FEH 2022 is preferred). Can the applicant provide amended hydraulic calculations using an updated FEH dataset?
3. We would expect for the hydraulic calculations to demonstrate a CV value of 1.0 for both Summer and Winter simulations.

Unless the applicant provides additional information responding to the above comments, Kent County Council as Lead Local Flood Authority would not recommend the application be progressed at present.

Response received 13 February 2025

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy prepared by JPP (Aug 2024) and have the following comments:

The applicant's consultant has recommended a separation distance of 10 m between soakaways and foundations. Ground instability is a risk that should be managed appropriately. Kent County Council guidance recommends separation distances that reflect the depth of the drainage measures i.e. 5m for conventional soakaways and 10m for deep bored soakaways. The CIRIA report C574D "Engineering in Chalk" recommends specifically:

- In areas where dissolution features are known to be prevalent, soakaways should be avoided if at all possible, but if unavoidable, should be sited at least 20 m away from any foundations.
- Where the chalk is of low density, or its density is not known, soakaways should be sited at least 10 m away from any foundations
- Where the chalk is of medium density (or higher), the closest part of the soakaway should be at least 5 m from any foundation.

Usually, we would follow the recommendations as provided by the professional consultants, but no evidence has been provided to demonstrate that known dissolution features are present or the information

as to the chalk density. We would recommend that the justification for this recommendation is sought from the applicant as it impacts the overall layout and drainage provision.

Additionally, Kent County Council as Lead Local Flood Authority would be sceptical to accept that infiltration is entirely unviable at this stage and would highlight firstly, testing was not undertaken in line with BRE 365 standards, and secondly, the Drainage Strategy states it was "possible that the fines (clay/silt) content limited the permeability or smearing of the borehole surface and that deeper deposits or testing in machine pits could show improved infiltration potential". We would not expect for this to have been completely disregarded at this stage and expect for this to be further considered in order to demonstrate categorically that compliance with the more preferable solutions of the Drainage Hierarchy can not be complied with.

It is also noted that the current calculations use the FeH 1999 dataset, this is dataset is no longer accepted by KCC and we would request that the latest FEH 2022 dataset is used (2013 is acceptable but ideally 2022). Can the applicant provide amended hydraulic calculations using an updated FeH dataset?

Whilst it is proposed for the system to tie into the existing school private network no details of the capacity of the existing system or it's final outfall has been provided. As such we cannot be certain that the system will cope with additional flows or indeed if it would be acceptable to connect - should the final outflow be shown to be to a combined or surface water sewer this would cause serious concern.

Unless the applicant provides additional information responding to the above comments, Kent County Council as Lead Local Flood Authority would not recommend the application be progressed at present.

Sport England

Response received 14 August 2025

Thank you for re-consulting Sport England on the above application with additional the section through the artificial grass pitch. This is satisfactory and therefore the condition we requested to cover this element is no longer required

[From the section entitled 'For clarity, Sport England's Position', the rest of the response is the same as that received on 01 August 2025 except that condition 1 is no longer required.]

Response received 01 August 2025

Thank you for re-consulting Sport England on the above application with additional drainage information.

We have reviewed the documentation and have no further comments to make beyond those we made on the 9th of May 2025.

[From the section entitled 'For clarity, Sport England's Position', the rest of the response is the same as that received on 13 May 2025]

Response received 13 May 2025

Thank you for re-consulting Sport England on the above application.

We have reviewed the comments made by the applicants' consultants and pleased to see they have confirmed the size of the pile and containment issues.

However, while they state the Football Foundation is substantially funding the project, Sport England is concerned what happens beyond the funding agreement, hence condition 3.

We are pleased note that the school are in the process of producing a community use agreement and we encourage them to share that with us at their earliest convenience. If we can avoid having a community use condition and have it as part of the application, we would welcome it.

Currently there is nothing to warrant Sport England removing our request for condition 1. We would be happy to do this if the applicants provide us with the drawings during the life of this planning application.

For clarity, Sport England's Position:

Given the above, Sport England raises no objection to the application because it is considered to accord with exceptions 3 and 5 of our Playing Fields Policy and paragraph 104 of the NPPF.

The absence of an objection is subject to the following conditions being imposed should the local planning authority (LPA) resolve to approve the application:

1. No development shall commence until details of the design and layout of the artificial grass pitch, this should include sections though the spectator area and edge of the pitch. have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The artificial grass pitch shall not be constructed other than in accordance with the approved details.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.

2. Within 3 months of the date of this permission, a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to outdoor sports facilities, 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 facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.

3. Within 6 months of completion, 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 a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy **.

4. Within 6 months of practical completion:

(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 have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy **.

If the LPA is minded to approve the application without imposing the above conditions then Sport England objects to the application as it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF.

If you wish to amend the wording of the condition(s) or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Should the local planning authority be minded to approve this application without the above condition(s), then given Sport England's subsequent objection the Town and Country Planning (Consultation) (England) Direction 2021 requires the application to be referred to the Secretary of State via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Response received 03 February 2025

Summary:

Sport England raises no objection to this application as it is considered to meet exceptions 3 and 5 of our Playing Fields Policy and to accord with Paragraph 104 of the National Planning Policy Framework (NPPF), subject to conditions.

Sport England – Statutory consultee role and policy:

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. A summary of the exceptions is provided in the annex to this response.

The Proposal and its Impact on the playing field:

The proposal is for the construction of sports lit 3G artificial grass pitch (3G AGP) with perimeter fencing, spectator areas and access paths; installation of sports lighting around existing Multi Use Games Area (MUGA); installation of storage container; and formation of landscaped bund.

Assessment against Sport England's Playing Fields Policy and NPPF:

It should be noted that artificial grass pitches (AGPs), have a limited life and require significant maintenance to keep them in a playable condition. Because the top surface or carpet as it is commonly referred to has to be replaced approximately every 10 years there must be a sinking fund created to ensure this happens. A grass pitch does not need a sinking fund, and in reality, the maintenance is very light compared to an AGP.

As part of our assessment, we have consulted with Kent Football Association/the Football Foundation, (KFA/FF) who are the experts in football provision in the Kent County.

In this instance we think it is appropriate to include most of their comments verbatim as they do add to the assessment of the planning application:

There are currently no full-size 3G FTPs available within the Gravesham local authority area. The closest full-size 3G FTPs are located in adjacent local authorities, which are already operating at full capacity. The LFFP (2018) and the PPS (2017) highlighted a shortfall of four 3G FTPs, these documents

are considered outdated, and there has been a notable increase in the number of teams within the borough since publication. According to the affiliation data for 2024/25, Gravesham has 232 teams, reflecting an increase of 82 teams compared to the figures presented in the LFFP, thereby demonstrating an up-to-date requirement for six 3G FTPs. Northfleet School for Girls was highlighted in the Gravesham LFFP as a priority project.

The school has been in discussions with the Football Foundation and Kent FA regarding funding. Therefore, the project is proposed to go through the Football Foundation Framework which will ensure the required standards are met. The pitch is a 91m x 55m community pitch. 91x55 meets local league requirements, has no negative effect on training or matchplay, or the programme of use as a whole, and therefore provides a more viable and sustainable facility to meet local needs. The AGP will cater for all formats of football. There has been no identified need for additional 9v9 pitches in the area therefore, this pitch would still service the needs of the local community, as well as providing additional opportunities for midweek training. The 3G FTP design will follow The FA Guide to Football Turf Pitch Design Principles and Layouts. Any 3G pitch to be used for FA affiliated football in England must be on the FA 3G pitch register. Teams hosting matches on a pitch that is not on the register are at risk of the league or competition imposing sanctions. This pitch will be on the FA Pitch register and would be conditioned as part of the grant award.

The Football Foundation and Kent FA are fully supportive of the proposal.

We are content that there is a strategic need for a sports lit 3G AGP and not the comments made by KFA/FF about the need for the pitch to be on the FA pitch register.

It should be noted that the AGP while the intention is that is funded by the Football Foundation, it could be funded by AN Other once it has planning permission. Therefore, it is important due the strategic need to ensure that there is a community use agreement condition attached to the permission should the application be granted permission.

It is disappointing the applicants' agents do not refer to the need for a sinking fund or maintenance programme. These can be conditioned.

With reference to the design and access statement, the applicants are unclear of the construction of the 3G AGP. It is surprising there no mention of a geotextile membrane to prevent weed growth in their two possible construction, (page 8). Given the uncertainty of the construction, we would strongly advise a condition to ensure that the AGP is properly constructed.

On page 11 of the design and access statement, the applicants refer to the pile of the carpet to being long pile, on but do not give size. With reference to our design guidance: Artificial Surfaces for Outdoor Sport, we note there are two long piles: 60-65mm, which is more suited for rugby, and 55-60mm, which is more suited to football. As mentioned above there is no guarantee that the Football Foundation will fund the project, therefore it is important that the 3AGP is built to be fit for purpose. This can be addressed via a condition.

With reference again the design and access statement, the applicants do discuss infill mitigation (page 17) measures, which is welcomed and necessary. However, there is no mention of interceptors to prevent the infill migrating into the drainage system then into the natural environment. There is no mention either in the drainage strategy. We would advise that the drainage system includes for interceptors to ensure that infill does not leach into the natural environment.

We welcome the information on the biodiversity net gain. We consider the proposed location of the BNG to meet our planning policy exception E3.

Given there is a strategic need for the proposal, then subject to conditions, Sport England is content the proposal would meet our planning policy exception E5.

Sport England's Position:

Given the above, Sport England raises no objection to the application because it is considered to accord with exceptions 3 and 5 of our Playing Fields Policy and paragraph 104 of the NPPF.

The absence of an objection is subject to the following conditions being imposed should the local planning authority (LPA) resolve to approve the application:

1. No development shall commence until details of the design and layout of the artificial grass pitch, this should include sections through the spectator area and edge of the pitch. have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The artificial grass pitch shall not be constructed other than in accordance with the approved details.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.

2. Within 3 months of the date of this permission, a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to outdoor sports facilities, 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 facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.

3. Within 6 months of completion, 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 a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy **.

4. Within 3 months of practical completion:
 - (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 have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy **.

If the LPA is minded to approve the application without imposing the above conditions then Sport England objects to the application as it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF.

If you wish to amend the wording of the condition(s) or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Should the local planning authority be minded to approve this application without the above condition(s),

then given Sport England's subsequent objection the Town and Country Planning (Consultation) (England) Direction 2021 requires the application to be referred to the Secretary of State via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Environment Agency

Response received 19 August 2025

It is understood that the drainage proposal has changed since our response dated 22 January (ref. KT/2025/132279/01-L01) and therefore we wish to revise our position.

As part of this re-consultation, we have reviewed the following documents:

- Drainage Strategy, ref. R-DS-28616-01-A rev. A, dated 21 July 2025, by JPP

Environment Agency Position:

We have no objection to the proposed development subject to the following planning conditions being included in any permission granted.

Section 1: Technical comments:

The proposed development is located on a principal aquifer and within a Source Protection Zone (SPZ) 2. Controlled waters are therefore sensitive in this location.

Whilst we have no objection in principle to the proposal, the design of infiltration SuDS may be difficult or inappropriate in this location. We therefore request that a planning condition securing surface water drainage details, as set out in Section 2 of this letter, be included in any permission granted. Without this condition we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution.

[From the section entitled 'The Environment Agency's Approach to Groundwater Protection', the rest of this section of the response is the same as that received on 22 January 2025]

Section 2: Conditions and informatives:

Note to the LPA: Condition wording

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority conditions, please contact us to discuss the revised wording.

Condition 1 (Infiltration of surface water)

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 or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 187 of the National Planning Policy Framework.

Section 3: 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

Response received 22 January 2025

Environment Agency Position:

We have screened the application and have no objection in relation to groundwater and contaminated land. However, we have the following comments to make.

The Environment Agency's Approach to Groundwater Protection:

We recommend the applicant reviews our groundwater position statements in 'The Environment Agency's approach to groundwater protection', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

Land contamination: risk management and good practice

We recommend that the applicant should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- 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
- 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
- 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.

Discharge of treated sewage effluent:

If you are proposing a non-mains drainage solution the following form should be completed and submitted with any application:

<https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

The discharge of domestic sewage may be subject to General Binding Rules (GBRs) under the

Environmental Permitting (England & Wales) Regulations 2016, which provide a statutory baseline of good practice. You can find more information online at <https://www.gov.uk/permits-you-need-for-septic-tanks/permits> or contact us on 03708 506506. If your proposal cannot meet the GBRs then a permit will likely be required.

Piling:

Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. It should therefore be demonstrated that any proposed piling will not result in contamination of groundwater. If piling is proposed, a Piling Risk Assessment should be undertaken to confirm the proposed design does not pose risks to the groundwater. This should be in accordance with our guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73".

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:

- 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
- treated materials can be transferred between sites as part of a hub and cluster project
- 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:

- The position statement on the Definition of Waste: Development Industry Code of Practice
- 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:

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

Response received 10 October 2025

Proposed Soakaways:

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of Soakaways to dispose of surface water from the proposed development. 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.

Condition:

We request that should this application receive planning approval, the following condition is attached to the consent: Construction of the development shall not commence until details of the proposed means of surface water run off disposal in accordance with Part H3 of Building Regulations hierarchy as well as acceptable discharge points, rates and volumes have been agreed by the Lead Local Flood Authority, in consultation with Southern Water.

Foul drainage is not required for this development.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Response received 09 October 2025

Following review of the submitted documents, Southern Waters Previous letters dated the 29th of January 2025 & 31st of July 2025 remain valid.

Response received 31 July 2025

Southern Waters letter dated the 29th of January 2025 remain valid. Following the review of the newly submitted documents, Southern Water has the following comment below.

Proposed soakaways:

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of

soakaways to dispose of surface water from the proposed development. 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.

Response received 29 January 2025

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.

Foul drainage is not required for this development.

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.

STG Building Control Partnership
No response received.

Neighbouring properties

The application was publicised on two occasions by a site notice and to 127 neighbouring properties by letter. 35 representations (29 objecting, 3 in support and 3 neither supporting or objecting) have been received and the issues raised are summarised below;

Objections:

- There is no need for this facility as others exist locally.
- Adverse impact to Cygnet Centre sports facility.
- An alternative location would be preferable.
- The school is becoming overdeveloped.
- The use and floodlighting would be out of character with the surrounding area.
- Adverse noise impacts from use (crowd noise, bad language, whistles, balls hitting fences) and vehicles, to neighbours including a care home.
- Adverse light impacts from use and vehicles, to neighbours including a care home.
- Adverse impacts to traffic, exacerbating pollution and congestion in Hall Road.
- Adverse parking impacts.
- No provision for electric vehicle chargers in the parking area.
- Loss of, disruption to and harm to wildlife (loss of grass, microplastics from pitch, from lighting).
- Replacement of grass pitch with synthetic turf is not environmentally friendly and will contribute to the heat island effect and future plastic waste.
- Adverse impacts to human health from microplastic pollution including carcinogenic chemicals.
- Synthetic pitches can become waterlogged
- Adverse impacts of foul and surface water drainage, including flooding.
- The pitch would be excessively large.
- Adverse littering impacts, including encouraging vermin.
- Potential for crime if high value equipment left on site.
- Hours of operation are not acceptable and should be shorter, late night and weekend use is excessive.
- Lack of consultation/notification to neighbours.
- Adverse impacts of construction to neighbours.
- Adverse financial impacts, including property values.

- Adverse impacts to mental health of neighbours

Reasons for support:

- Health and fitness benefits.
- High demand for multi-sports pitches especially in winter.
- The girls school location would encourage female participation in sport.
- No other affordable facility in the area for use by local football clubs.

It should be noted that one local resident has also made verbal representations regarding the appropriateness of the ownership notification procedure for the application. As set out in the 'Procedural Issues' section above, the application form was then amended to correct an error in this regard. No further publicity was undertaken following this amendment because it was for clarification purposes only.

Officer's Analysis

Details of the Proposal

The proposed development comprises of the provision of a synthetic turf football pitch (97 metres by 61 metres including run-off areas) with LED floodlighting; the provision of LED floodlighting to the existing multi-use games area (MUGA); and the formation of an earth bund. The synthetic pitch would mainly be surrounded by 4.5 metre high twin bar panel fencing with a 1.2 metre high fence on part of the western side (to a spectator area). The fence would be coloured dark green and include noise reducing dampeners. On the north eastern side of the pitch, a 3 metre high acoustic barrier would be erected. A 3.2 metre wide access path and a spectator area would also be provided.

The proposed floodlighting for the football pitch would comprise of 8 x 15 metre high columns, with 12 LED floodlights, fitted with louvres and for the MUGA, would comprise of 10 x 8 metre high columns, with 10 LED floodlights. The floodlighting would be grey ion coloured.

Due to the slope of the site, the pitch would be created using a cut and fill operation, with spoil being used to create an earth bund located on the eastern side of the pitch. The bund would have a triangular shape with a maximum height of 1.5 metres, a length of 50 metres and a maximum depth of 12.7 metres.

As a result of the proposal, the summer playing field layout would be amended to relocate the athletics track, shot put and runway areas to the eastern side.

Tree planting (some 44 trees) would be undertaken on land close to the southern boundary of the application site.

A steel storage container (powder coated, bottle green in colour) would be installed on the south western boundary of the proposed pitch, with dimensions of 6.1 metres (length) by 2.4 metres (width) by 2.5 metres (height). It would be used to store maintenance and sporting equipment.

The new pitch would be used by the school only between 08.00 to 17.00 Mondays to Fridays and be available for use by the community from 17.00 to 21.30 Mondays to Fridays, from 09.00 to 21.30 on Saturdays and on Sundays and Bank Holidays, from 09.00 to 18.00. The proposed floodlighting would only be operated 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 existing parking areas and access arrangements to the school would not be altered.

Principle of the Development

Paragraph 103 of the National Planning Policy Framework 2024 (NPPF 2024) sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Paragraph 104 of the NPPF 2024 states that existing open space, sports and recreational buildings and land should not be built on unless it has been clearly shown to be surplus to requirements or it would be replaced by equivalent or better provision in a suitable location or the

benefits of the alternative sports/recreation provision clearly outweigh the loss of the current/former use.

Policy CS10 of the Gravesham Local Plan Core Strategy (2014) states that support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure or lead to the provision of additional infrastructure that improves community well-being.

Policy CS13 of the Gravesham Local Plan Core Strategy (2014) seeks to make adequate provision for, and to protect and enhance, the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.

Whilst it is acknowledged that some local residents consider that there is no need for the proposal, Sport England do not raise an objection and advise that there are currently no full-size 3G (Third Generation) football turf pitches (FTPs) available within the Gravesham area. Furthermore, they set out that the Football Foundation and the Kent Football Association are fully supportive of the proposal. In addition, the GBC Leisure & Resilience Manager (Communities) supports the proposal because it would help to meet an identified need for artificial pitches in Gravesham (four community available full size 3G pitches in the Borough).

It is noted that a planning application seeking to convert a natural turf football pitch to artificial grass at The Sports Ground, Dunkirk Close, Gravesend is pending consideration (reference 20251117).

It is also noted that other local residents support the proposal because there would be health and fitness benefits, because the girls school location would encourage female participation in sport, because it would provide an affordable facility for local football clubs and because there is a high demand for multi-sports pitches, especially in winter.

Sport England also advise that artificial grass pitches (AGPs), have a limited life and require significant maintenance to keep them in a playable condition. As such, they require the creation of a sinking fund to ensure the future usage of the proposed development. They also require the imposition of conditions relating to the submission and approval of a community use agreement, a Management and Maintenance Scheme for the facility (including management responsibilities) and confirmation being provided that the built development meets appropriate standards for football. These conditions would ensure future community use, an appropriate construction and future maintenance of the pitch and as such, would be appropriate and can be attached to any planning permission granted.

Overall, there is a strategic need for the proposed development and it would improve the sports facilities at an existing secondary school. In addition, the proposal would provide increased opportunities for the community to participate in physical exercise. As such and subject to the imposition of Sport England's suggested conditions, the proposal would be acceptable in principle and in line with paragraphs 103 and 104 of the NPPF 2024 and Policies CS10 and CS13 of the Gravesham Local Plan Core Strategy (2014).

The details of the proposal will now be assessed with regard to design, amenity, highways, ecological, drainage and other material considerations.

Design, Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

Local residents have raised concerns that the school is becoming overdeveloped and that the proposed use and floodlighting would be out of character with the surrounding area.

The proposed pitch would be of substantial size and would result in the loss of a grassed area of land within

the playing field of the school. The proposed pitch, fencing, lighting and associated hard surfacing would introduce built development and lighting into an area that is currently open and dark at night but it is noted that the proposal generally, would be largely screened by surrounding mature vegetation on the site boundaries. Whilst the floodlighting, when in use would be visible outside the school site, it would not significantly alter the character of the surrounding urban area.

Overall, the existing use of the land for sport and recreation would be retained and the proposed development would not look out of place within its school playing field surroundings. Furthermore, the proposal would not result in an overdevelopment of the school site. As such, there would be no significant adverse impacts to the character or appearance of the application site or the surrounding area and the proposal would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The school playing field is surrounded on three sides by residential properties in Hall Road (across the roadway, to the north west) and Fortrye Close, The Hedgerows and Riversdale (immediately adjacent, to the south and east). The Wombwell Hall Nursing Home, Wombwell Gardens is located immediately to the north east.

The proposed development has the potential to cause adverse noise/disturbance and lighting impacts to the occupiers of surrounding residential properties, by virtue of the introduction of floodlighting and the extension of sports activities during winter months. The application details include noise and lighting assessments and include measures to mitigate adverse impacts, including the provision of an acoustic barrier and louvres on the floodlights for the proposed football pitch.

Local residents have raised concerns regarding adverse noise impacts from crowd noise, bad language, whistles, balls hitting fences and from vehicles, to neighbours including the occupiers of a care home and regarding adverse light impacts from the proposed use and from vehicles, to neighbours including the occupiers of a care home. They also suggest that the proposed late night and weekend use is excessive and that the proposed hours of operation should be shorter.

Following a noise assessment and some amendments to the proposed lighting scheme, the GBC Environmental Protection Team (Regulatory Services) do not raise an objection to the proposal but seek the submission and approval of details of the proposed acoustic barrier and a noise management plan via planning conditions. They also request the imposition of various other conditions to ensure that there would be no adverse noise or lighting impacts (hours of operation, automatic shut offs for the floodlights and no amplified music or voices). These conditions would protect residential amenity and mitigate light and noise pollution and as such, it would be appropriate to attach them to any planning permission granted.

It would also be necessary to condition the submission and approval of details of the proposed protective fencing around the football pitch in order to ensure that it designed to mitigate adverse noise impacts from balls hitting it.

It is noted that the proposed hours of operation for the proposal have been amended (following comments from the GBC Environmental Protection Team (Regulatory Services)) from 8.00 to 22.00 every day to 08.00 to 21.30 Mondays to Fridays, from 09.00 to 21.30 on Saturdays and on Sundays and Bank Holidays, from 09.00 to 18.00.

It is also noted that the floodlights would only operate between the hours of 16.00 to 21.00 on Mondays to Saturdays and 16.00 to 17.30 on Sundays and Bank Holidays.

In order to mitigate against any adverse ground contamination/pollution impacts, the GBC Environmental

Protection Team (Regulatory Services) require the imposition of a watching brief contamination condition, which would be appropriate.

Local residents have raised concerns regarding adverse impacts to human health from microplastic pollution including carcinogenic chemicals. Whilst these concerns are acknowledged, artificial grass pitches are supported by Sport England and at present, there are no health or environmental based restrictions on their use.

Local residents have also raised concerns regarding adverse littering impacts, encouraging vermin. However, it is noted that the playing fields are already used outside of school hours and the proposed development, although increasing the extent of this use, would not be likely to result in users being more likely to litter.

Overall, the design of the proposal would mitigate any adverse noise or lighting impacts to surrounding residential occupiers and there would be no increase in the likelihood of littering above the existing situation. Therefore, subject to the imposition of appropriate conditions, there would be no significant adverse impacts to residential amenity and the proposal would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Parking and Highways

Paragraph 115(b) of the NPPF 2024 requires new development to ensure that safe and suitable access can be achieved for all users and paragraph 116 sets out that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety.

Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994) require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

The application site has two existing vehicle accesses and two parking areas. The application details show that the total number of parking spaces is 131 with 11 of these being disabled spaces. The parking area closest to the proposed development has 14 parking spaces (3 disabled). In addition, (and not shown on the submitted plans) there are 12 additional parking spaces located on a hard surfaced area, to the south east of that car park.

Local residents have raised concerns regarding adverse impacts to traffic and parking and the proposal exacerbating pollution and congestion in Hall Road. However, KCC Highways & Transportation do not raise an objection to the proposal and consider that it would be unlikely to increase traffic generation to the school site and that adequate parking provision is already available. They request the submission and approval of a Travel and Parking Management Plan to ensure that the traffic generation and parking demand is quantified and kept to a minimum and to encourage attendees to utilise sustainable transport methods.

Whilst the proposal would increase vehicle movements and parking demand associated with the school both in the evenings and on weekends, these additional movements can be accommodated on existing roads and in existing parking areas.

Overall, subject to a travel and parking management plan condition, it is considered that there would be no adverse highways or parking impacts and the proposal would not be detrimental to highway safety. As such, the proposed development would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994).

Ecology and Biodiversity

Paragraph 193(a) of the NPPF 2024 states that, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Paragraph 193(d) of the NPPF 2024 states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Policy CS12 of the Gravesham Local Plan Core Strategy (2014) states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within Biodiversity Opportunity Areas and within new development.

In addition, under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG). Where BNG is required, the Defra Statutory Metric must be used to demonstrate that a minimum 10% biodiversity net gain can be achieved and the habitats created/enhanced to achieve BNG must be secured for at least 30 years.

A baseline assessment, BNG metric and details of the post development habitats have been provided as part of the application. The KCC Biodiversity Officer advises that, because there would be limited opportunity for habitat creation at the application site, due to the proposed sports use, then there would be a BNG deficit of -20.16% and a unit deficit of 1.02 habitat units and that these deficits can be overcome by habitat creation offsite, the details of which can be set out in a Biodiversity Gain Plan.

The KCC Biodiversity Officer initially queried whether the proposed bund could be utilised for some post development habitat creation. However, the applicant has since clarified that due to the school use, adverse recreational impacts would preclude this approach, a reasoning which has been accepted by KCC.

Local residents have raised concerns regarding the loss of, disruption to and harm to wildlife (including the loss of natural grass, the adverse impacts of microplastics from the pitch and from the proposed lighting).

In addition to the BNG information, a preliminary ecological appraisal (PEA), bat survey report and an arboricultural assessment have been submitted. The KCC Biodiversity Officer does not raise an objection to the proposal but notes that habitat is present at the site and its surroundings, which could provide opportunities for protected species. However, she is satisfied, subject to the use of a precautionary works method statement (PWMS) and the submission and approval of details of ecological enhancements, that the proposed use and construction works can be undertaken without adverse impacts to wildlife and that biodiversity can be enhanced at the site. The wording of an appropriate condition has been provided and can be attached to any planning permission granted.

Subject to appropriate conditions/informatives, the proposed development would improve biodiversity at the application site and would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and paragraphs 193(a) and 193(d) of the NPPF 2024.

Drainage

Policy CS18 of the Gravesham Local Plan Core Strategy (2014) seeks to minimise the impacts of drainage from new development on waste water systems, requiring that surface water run off has no greater adverse impact than the existing use and that Sustainable Drainage Systems (SuDS) are used where technically and financially feasible.

Local residents have raised concerns that synthetic pitches can become waterlogged and that the proposal would cause adverse foul and surface water drainage impacts, including flooding.

The proposed development would include the provision of a SuDS, the design of which has been amended following the comments received from KCC Flood & Water Management.

The Environment Agency advise that the proposed development is located on a principal aquifer and within Groundwater Source Protection Zone (SPZ) 2 and that controlled waters are therefore sensitive in this location. As such, they state that the design of infiltration Sustainable Drainage Systems (SuDS) may be

difficult or inappropriate. However, they do not raise an objection to the proposal, subject to the imposition of a condition precluding drainage systems that involve the infiltration of surface water to the ground without prior written consent.

KCC Flood & Water Management do not raise an objection to the proposal but require the submission and approval of a sustainable surface water drainage scheme and a verification report (before the development is first used) to ensure that the surface water generated by this development can be accommodated and disposed of within the curtilage of the site, without any increase to flood risk on or off the site. Again, these can be the subject of appropriately worded planning conditions.

Southern Water do not raise an objection to the proposal and request the imposition of a condition requiring the proposed means of surface water run off disposal to be approved prior to commencement. A suitably worded SuDS condition (as referred to above) would cover this requirement. They also provide information regarding building control drainage issues which can be brought to the attention of the applicant via an informative on any planning permission granted.

It is noted that the applicant has indicated that a pre-commencement drainage condition would be acceptable.

Therefore, subject to appropriate drainage conditions, the proposal would not cause adverse water pollution or flooding impacts and would be in line with Policy CS18 of the Gravesham Local Plan Core Strategy (2014).

Any Other Material Planning Considerations

The application site is located within an area of some palaeolithic potential and a former site of a high-status residence and associated gardens (Wombwell Hall). However, as the proposed development is within the confines of an existing school site and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to archaeology. As such, the proposal would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

Local residents have raised concerns that there would be potential for crime if high value equipment is left on site. The Kent Police Designing Out Crime Team have made a number of recommendations regarding security/prevention of crime and the design of the proposal, which can be brought to the attention of the applicant via an informative on any planning permission granted. Overall, as a school site, the existing security arrangements are of a high standard and the proposed development would not significantly increase the threat of crime above that existing.

Local residents have raised a number of concerns, the majority of which have been covered in the above discussion. The outstanding issues are summarised (in italics) and commented on as follows;

- *Adverse impact to Cygnet Centre sports facility* – the proposed development would provide a full-size, 3G football pitch, which is not available at the Cygnets Centre or elsewhere in Gravesham. As such, the proposal would complement existing sports provision.
- *An alternative location would be preferable* – The proposal must be determined as submitted. There is no specific policy requirement to consider an alternative location and it is noted that the application site is located in a sustainable and accessible urban location, which is in line with national and local development plan policy.
- *No provision for electric vehicle (EV) chargers in the parking area* – this is a negative feature of the proposal but there is no specific policy requirement for EV chargers to be provided.
- *Replacement of grass pitch with synthetic turf is not environmentally friendly and will contribute to the heat island effect and future plastic waste* – Whilst these would be negative environmental impacts, they must be balanced against the significant leisure and health benefits of the proposal.
- *The pitch would be excessively large* – Sport England do not raise an objection to the layout or construction of the proposed pitch and as such, its size is considered to be acceptable.
- *Lack of consultation/notification to neighbours* – the proposal has been subject to two rounds of

publicity (by letter and site notice) and as such, the required statutory publicity has been undertaken.

- *Adverse impacts of construction to neighbours* – these are not material planning considerations.
- *Adverse financial impacts, including property values* – these are not material planning considerations.

Suggested Conditions

Time limit

Approved plans

Pre-commencement details of SUDs

From commencement precautionary mitigation measures for wildlife

Within 3 months of permission date, community use agreement

Within 3 months of commencement, on-site biodiversity enhancements

Prior to erection of protective fencing, submission and approval of details

Within 3 months of completion, confirmation that football standards are met

Within 6 months of completion, submission and approval of Management and Maintenance Scheme

Prior to first use details of the acoustic noise barrier

Prior to first use submission and approval of Noise Management Plan

Prior to first use, submission and approval of Travel and Parking Management Plan

Prior to first use the floodlighting installed in accordance with lighting design scheme

Prior to first use, verification report pertaining to the surface water drainage system

Hours of operation

No amplified music or voice

Floodlighting hours of operation and automatic timer

Contamination watching brief

No drainage systems for the infiltration of surface water to the ground without consent

Biodiversity Gain Plan

Suggested Informatives

Positive/proactive

Building Regulations/Party Wall

Deviation from the approved plans

Biodiversity Net Gain

KCC Biodiversity Officer

KCC Flood and Water Management

Southern Water

Environment Agency

KCC Highways & Transportation

Kent Police Designing Out Crime

Works of construction

Agreement with pre-commencement conditions

Conclusion

The proposal would comply with local and national planning policies and subject to the conditions set out above, the proposal would be acceptable.

Recommendation

Planning permission subject to conditions is recommended.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Mrs Faye Walsh
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Signed:	K Joyce	Signed:	Jusab
Dated:	04 December 2025	Dated:	04 December 2025