



Delegated Report

Full Planning Application

Application No:	20231014
Location:	Gravesend Cricket Club Bat And Ball Ground, Wrotham Road, Gravesend, Kent, DA11 0QP
Description:	Installation of a borehole and 25,000 litre water storage tank and erection of a fibreglass structure to house the pump/pressure vessel.
Applicant:	Timothy Hance
Site Visit:	N/A Desktop Assessment

Submitted Documents/Plans

- Application Form - dated 2 October 2023;
- Supplementary Information - Image of Water Tank;
- Supplementary Information - Image of Pump Room;
- Drawing no. 3089-001 - Rev. 0 - Site Location Plan;
- Drawing no. 3089-002 - Rev. 0 - Existing and Proposed Block Plans;
- Drawing no. 3089-003 - Rev. 0 - Existing and Proposed North Elevations (indicative);
- Drawing no. 3089-003 - Rev. 1 - Existing and Proposed North Elevations;
- Drawing no. 3089-004 - Rev. 0 - Existing and Proposed East and West Elevations.

Relevant Planning History

Reference	Description	Decision	Decision Date
19850511	Retention of a 2000-gallon water storage tank and pump house	PERMITTED	05.09.1985

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-designed Places

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)

Consultations, Publicity and Representations

External Consultees

Southern Water - Southern Water would have no objections to the above proposal.

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.

Please note: There is a private communication pipe within the development site.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119), www.southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk.

Environment Agency - We have no comments to make on this planning application as it falls outside our remit as a statutory planning consultee.

Kent County Council Minerals & Waste - The County Council has no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this matter.

Kent County Council Flood and Water - As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure)(England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits;
- b) Waste development;
- c) The provision of dwelling houses where:
 - i. The number of dwelling houses to be provided is ten or more; or
 - ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c) (i);
- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Kent County Council Heritage - The site lies within an area of multi-period archaeological potential. However, I consider it unlikely that these proposals, adjacent to the existing dwelling, would have a significant below-ground archaeological impact and have no further comments to make in this case.

Internal Consultees

GBC Environmental Protection (Regulatory Services) - Due to the fact that the houses are screened somewhat from the proposal site by their own outbuildings, noise is unlikely to be an issue. However, no details of the pump itself have been submitted. I would like to see a technical specification for the pump along with acoustic data before making final comments or recommendation.

GBC Commercial Health (Regulatory Services) - No objection in principle. The following comments are made for the information of the applicant.

Public Health Comments - Private Water Supply

Abstraction Licence - If the applicant plans to take more than 20 cubic metres (20,000 litres) a day, they are likely to need an abstraction licence from the Environment Agency.

If they abstract groundwater the applicant must check if they need to apply for consent to investigate a groundwater source before they apply for a licence.

If the applicant abstracts water without a licence when they are required to have one the Environment Agency may take enforcement action.

The Private Water Supplies Regulations 2016 (as amended) - These Regulations place a statutory duty on Gravesham Borough Council Environmental Health Team to carry out a risk assessment of each private water supply, in their area, every 5 years. The local authority is also required to carry out water quality monitoring, at a frequency stipulated in the regulations, to determine compliance with drinking water standards and to verify the risk assessment. Gravesham Council can and will recover costs for these activities.

Due to the public health risks associated with inadequate private water supply sources, associated sampling, treatment and system maintenance costs and the risk of insufficient supply during dry periods, a mains water supply is considered the more appropriate supply type.

Where the applicant decides to continue with this proposal detailed information regarding the private water supply is required. This includes:

- Details of the source, the nature, exact location (northings & eastings grid reference) and adequacy of the source.
- Estimated daily volume of water usage in cubic metres.
- Number of consumers served (maximum).
- Details of the relevant person / organisation responsible for the up keep of the supply
- Details of any SOPs
- Diagram of supply including storage tanks / pipe work.
- The filtration and disinfection treatment proposed to ensure provision of an adequate and consistently wholesome water supply.

This information should be submitted to Environmental Health Commercial Section via email:
commercialhealth.admin@gravesham.gov.uk

Local Ward Councillors - No comment received.

Neighbouring properties

A notice was displayed on site.

In addition, sixty-nine surrounding properties were consulted, and one representation was received. The neighbour registered support for the application.

The consultation period expired 1st November 2023.

Officer's Analysis

Site Description

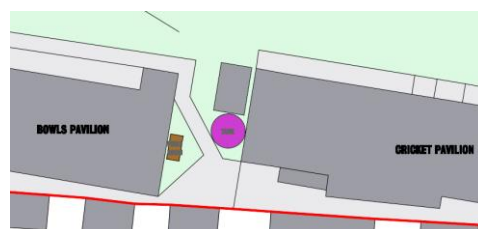
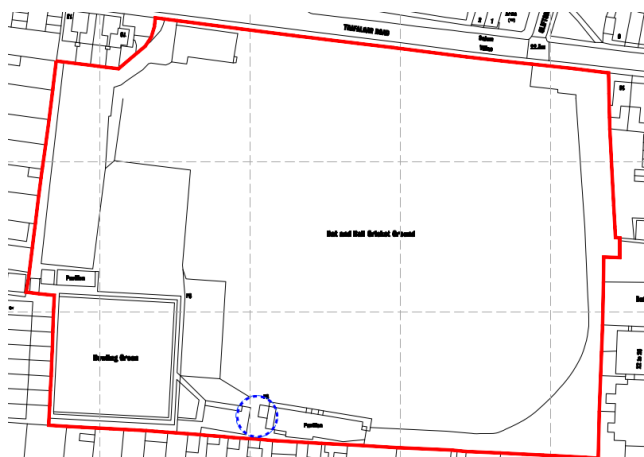
The application site is Gravesend Cricket Club, located within the urban area and surrounded by residential properties.



Proposed Development

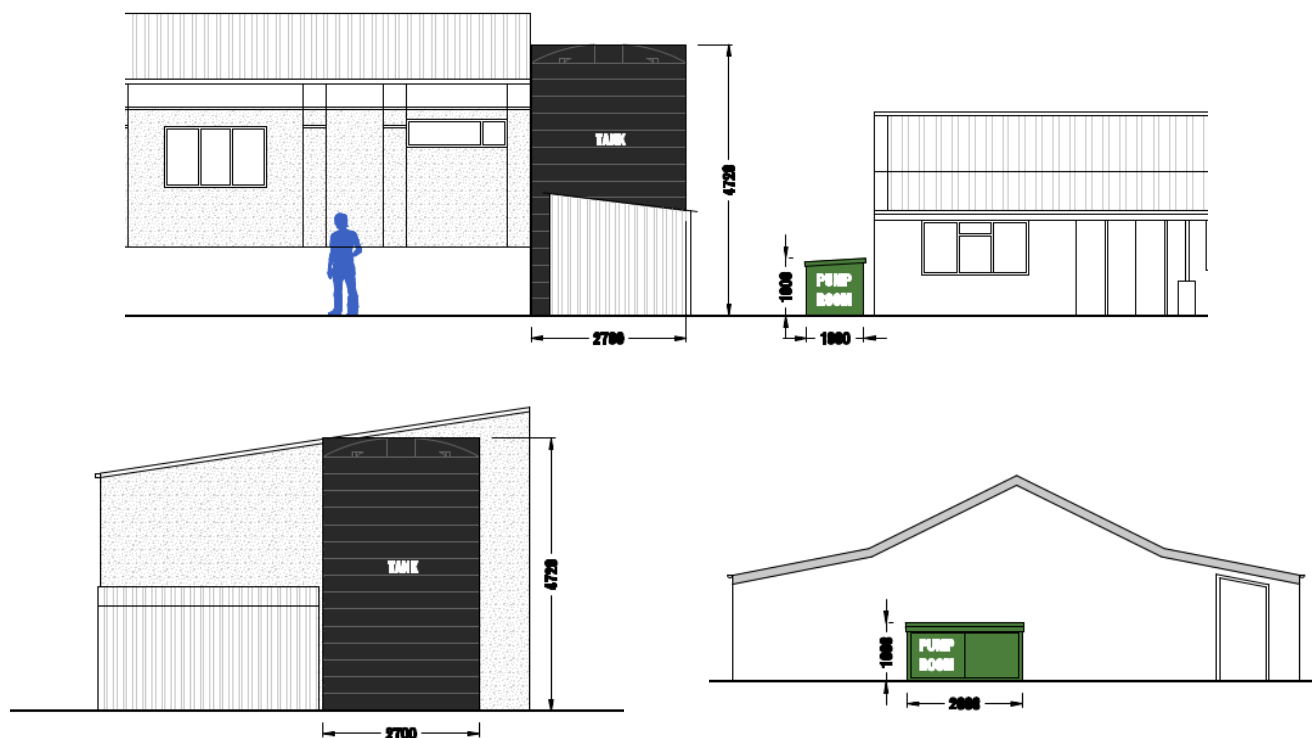
This application proposes the drilling of a borehole for water extraction, with associated 25,000ltr water tank and pump, located within a pump building.

The development would allow the Cricket Club to be self-sufficient in terms of water, by pumping 20,000ltrs of water a day into the storage tank. The borehole, pump building and tank would be located on the southern edge of the site, backing onto the rear gardens of properties on Essex Road. The below extract shows the location of the proposed development:



The proposed tank would have a height of 4.72m, with a diameter of 2.7m and overall area of 5.73m². This will be positioned behind a shed and next to the cricket pavilion. The pump room would have a height of 1m, depth of 1m and a width of 2m, and would be located adjacent to the bowls pavilion.

The screenshots below show the position and appearance of the tank and pump room.



The application has been supported by additional images of the proposed tank and pump room, which provide more detail than the plan extracts above:



Design, Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy (2014) states that new development will be visually attractive, fit for purpose and locally distinctive. It also seeks to conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area, whilst ensuring that the design, layout and form of new development will be derived from a robust

analysis of local context and character and make a positive contribution to the street scene, the quality of the public realm and the character of the area.

The proposed pump building and storage tank would be positioned towards the southern boundary of the site, located behind the tin shed and adjacent to the pavilion. This is approx. 128m from the entrance from Trafalgar Road and 124m from the entrance from Wrotham Road. Therefore, the proposed development is not considered to have any impact on the character or appearance of the area and the siting of the tank and pump building adjacent to the pavilions serves to minimise its visibility and prominence. As such, the proposed development is in accordance with Policy CS19 (LPCS) and Section 12 of the National Planning Policy Framework (NPPF) (2023).

Impact on Amenity

Policy CS19 (LPCS) seeks to protect amenity and ensure acceptable future living conditions. Section 12 of the NPPF (2023) also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings”.

The proposed development is positioned close to the southern boundary of the site and is approx. 26m from the rear of properties on Essex Road. Due to the distance, the large water tank will not have an impact on the amenity of neighbours in terms of outlook, sense of enclosure or loss of light.

However, the application is not supported by any details of the pump, its noise output or hours of operation. Although the 26m distance, enclosure and fencing/outbuildings between the pump room and the adjoining properties is likely to be sufficient to mitigate any noise impact, a condition will be attached to the decision notice to ensure that full details of the pump are provided to the Local Planning Authority and that a noise impact assessment is undertaken to ensure that the pumping of water does not cause nuisance to the detriment of amenity.

Therefore, subject to conditions relating to the pump and noise impact assessment, the proposed development is considered to safeguard amenity in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Parking and Highways

There are no parking or highway issues related to this proposal.

Any Other Material Planning Considerations

Water Abstraction

The proposed development seeks to abstract 20m³ of water per day, which does not require an abstraction license with the Environment Agency. The Environment Agency were consulted on this application as it falls outside of their statutory remit.

An informative will be attached to the decision notice highlighting the abstraction limit and providing details of how to apply for a license if this limit is exceeded.

Contamination and Drilling

The site is located to the south of a historic Victorian landfill, Nine Elms landfill. An investigation undertaken following the pre-application by the Environment Agency concluded the following:

“A Historic landfill (Nine Elms EAHLD19308) is located on the northern side of Trafalgar Road immediately to the north of the Cricket pitch. The information to hand shows this to be a Victorian tip and closed prior to 1900 so likely to be ash, glass, timber etc and not a gassy, difficult or putrescible waste site.”

Therefore, it is considered unlikely that the borehole and water abstraction would be contaminated by the landfill, however a watching brief condition will be attached to the decision notice to cover any potential impact.

It is also noted that the drilling of a borehole to a depth of 15m or more should be geologically logged and recorded with the British Geological Survey.

Private Water Supplies Regulations 2016 (as amended)

Gravesham's Commercial Health (Regulatory Services) Team have highlighted the Private Water Supplies Regulations, which require the Environmental Health Team to carry out a risk assessment of each private water supply every 5 years.

The Commercial Health team would require detailed information including the following:

- Details of the source, the nature, exact location (northings & eastings grid reference) and adequacy of the source.
- Estimated daily volume of water usage in cubic metres.
- Number of consumers served (maximum).
- Details of the relevant person / organisation responsible for the up keep of the supply
- Details of any SOPs
- Diagram of supply including storage tanks / pipe work.
- The filtration and disinfection treatment proposed to ensure provision of an adequate and consistently wholesome water supply.

An informative will be attached to the decision notice setting out these requirements and that the information listed above should be submitted to: commercialhealth.admin@gravesham.gov.uk.

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

The proposed borehole, pump and associated paraphernalia will have no impact on the character or appearance of the area and, subject to conditions relating to details and a noise impact assessment, will not impact on the amenity of any surrounding resident. An additional condition will be attached to the decision notice relating to contamination, and informatives will be attached to provide details of other requirements for the development.

Therefore, it is recommended that permission is granted subject to conditions.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	R Hart
Dated:	4 th December 2023	Dated:	5 th December 2023