

Proposed Multi-Use Games Area (MUGA) Development at Helen Allison School, Meopham

Planning Statement



Produced by
Ryder Landscape Consultants Ltd
on behalf of
National Autistic Society

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I.0 Introduction, Authorship and Instruction

- I.1 This document considers the planning implications of proposals to build a 32m x 16m Multi-Use Games Area (MUGA) with associated landscape and ecological works to the rear of the Helen Allison School in Meopham.
- I.2 My name is Stuart Ryder and I am a Chartered Landscape Architect and Director of Ryder Landscape Consultants Ltd (RLC). I have been a Chartered Member of the Landscape Institute since 1995 and act as an Expert Witness presenting evidence on landscape planning matters around England and Wales.
- I.3 Our instructions were to;
- Assist the National Autistic Society (NAS) who operate Helen Allison Scholl to prepare and submit a Planning Application to Gravesham Borough Council (GBC);
 - Respond specifically to the matters raised by GBC in their Pre-Application advice to the NAS dated 24th January 2023 as set in Appendix A;
 - Commission any surveys required to facilitate the design proposals and planning application, these comprised a Topographic Survey to accurately position the MUGA within the school grounds (Appendix B) and an Ecological Walkover Survey Note (Appendix C); and
 - Prepare a General Arrangement (GA) Drawing to locate the proposals within the school grounds and include environmental mitigation proposals to offset the biodiversity effects of the proposals, the GA Plan is set as Appendix D,
- I.4 This note follows the format of the GBC Pre-Application response for ease of cross referencing to ensure all topics raised by the GBC Development Control Team have been considered and fully addressed by the Applicant.
- I.5 RLC have previously supported the NAS in the design and delivery of another MUGA at their sister school in Cheshire.

2.0 The proposed development

2.1 The proposals are simple and comprise the following elements;

- 32 x 16m artificial grass sports surfaced pitch (green coloured) with coloured lines marking different sports pitches;
- Enclosure within a 1.8m high weld mesh fence with lower re-bound panels (all green coloured) to keep balls and sports equipment on the MUGA;
- Amenity grass and wildflower seeding to the sides of the MUGA pitch;
- A series of ecological features outside of the MUGA to the rear of the school.

2.2 The proposed Site is currently put to amenity grass and is used for outdoor play by the school's students. The students currently total 83 in number with ages from 5 to 19 years all with a range of additional educational needs.

2.3 The existing amenity grass area is usable for up to 5 months of the academic year (May, June, July, September and October) but for the remaining 6 months of the academic year is typically unusable due to waterlogging. The amenity grass is the largest, flat open space at the school and is used for a range of formal and informal games and educational activities when accessible.

2.4 It is the schools that wish to improve student access to this outdoor education resource in all season.

2.5 Construction access would be to the west side of the school past existing school buildings. There would be no alterations to existing highway accesses to the school, no diversion of existing Public Rights of Way (PRoW) or increased parking associated with the proposals.

2.6 There are no requirements for clearance of any trees or hedges with the only clearance required being the existing natural turf and 150m of topsoil to allow the sports surface build-up to be formed.

2.7 The school has programmed the six-week summer holidays in 2023 to have the MUGA constructed as it cannot be built during term time due to student safety and educational impact concerns. If they are unable to instruct Contractors for the summer 2023 window then construction, subject to planning consent, would have to be delayed until 2024.

2.8 The hours of operation would be normal school hours and the MUGA would be used solely by students at the school and no external groups.

3.0 Response to Pre-Application Advice

Background to the Pre-Application advice

- 3.1 The NAS Facility Manager was advised to use GBC online Pre-Application Advice Service and the Case Officer who assisted the process was Mrs Kelly Joyce.
- 3.2 The Pre-Application advice request was submitted by NAS on the 9th November 2022 and returned by GBC on 24/1/23.
- 3.3 On receipt of the Pre-Application advice RLC were approached to act as Planning Agents to the process to assist with understanding the design and consent implications of GBC's advice.

Format of Pre-Application advice

- 3.4 After briefly summarising the proposals and the site description the advice response is split into a series of headings and consultation responses. These are replicated below as sub-headings with the Applicant's response set under each.

Relevant Planning History

- 3.5 The Applicant concurs with the list of previous planning applications and are not aware of any other applications made to GBC. Nor is there any need for retrospective planning consent for any unconsented development at the school.

Development Plan and other related Planning Policies and Guidance

- 3.6 GBC have confirmed that the policies outlined in Table 1 below are the ones that the proposals will be judged against. The applicability column in the table confirms which are applicable to the final proposals. It is these policies that are addressed in greater detail in Section 4.

Table 1 – Applicability of Pre-Application Advice Listed Policies

Policy from Pre-App Advice	Applicability to the Proposals
Gravesham Local Plan Core Strategy 2014:	
CS01 Sustainable Development	Applicable
CS02 Scale and Distribution of Development	Applicable
CS10 Physical and Social Infrastructure	Applicable
CS11 Transport	Not Applicable – given no change to

Policy from Pre-App Advice	Applicability to the Proposals
	transport or access provision at school.
CS12 Green Infrastructure	Applicable
CS13 Green Space, Sport and Recreation	Applicable
CS18 Climate Change	Unclear
CS19 Design and Development Principle	Applicable
Saved Policies in the Gravesham Local Plan First Review 1994:	
T1 Impact of Development on Highway Network	Not applicable as there is no operational impact on Highway Network
P3 Vehicle Parking Standards	Not applicable as there are no proposals to alter or increase existing parking at the school as it is not required to facilitate use of the MUGA.
National Planning Policy Framework 2021:	
Section 2 Achieving sustainable development	Applicable
Section 8 Promoting healthy and safe communities	Applicable
Section 12 Achieving well-designed places	Applicable
Section 13 Protecting Green Belt land	Applicable
Section 15 Conserving and Enhancing the Natural Environment	Applicable
Supplementary Planning Guidance and other Documents	
PG4 KCC Parking Standards (2006).	Not applicable as there are no proposals to alter or increase existing parking at the school as it is not required to facilitate use of the MUGA.
Landscape Character Assessment (2009)	Applicable by virtue of the school being included in Area 8 – Meopham Downs Landscape Character Area.

GBC Leisure & Resilience Manager

- 3.7 Three summary paragraphs are provided which are addressed in turn below.
- 3.8 *Paragraph 1 queries current recreational use of the land and the need for the facility* – As explained in Section 2 the Site is flat, open amenity grass that is used as the school's primary external play space but that is only useable for 5 months of the academic year due to waterlogging and transfer of dirt into the school. The need for the external play and educational facility is for the full 11 months of the academic year.

- 3.9 *Paragraph 2 raises three points – recognition of the potential leisure improvement, the need for a Design and Access Statement and potential community use as an additional income stream for the school – The school wishes to not only enhance the duration but the quality of sports activities they can offer their students as well as use the space for outdoor learning activities. This Planning Statement has been prepared as a hybrid document containing a greater degree of design information (see Section 5). It is confirmed that the Site is too small to develop a Sports England compliant MUGA which limits its appeal to sports clubs. There are also operational concerns that the school does not wish to open to the public after hours.*
- 3.10 *Paragraph 3 sees the Leisure & Resilience Manager giving advice with regards to typical sizes of MUGA's which accords with the advice the Applicant has received – sadly there is not enough space at the school to accommodate a larger, typical sized MUGA. The smaller 32 x 16m pitch proposed will provide sufficient playing space for the students who do not compete in recognised sports teams who require a fuller pitch size. Early feasibility identified a larger pitch could be built but require the purchase or leasing of land from the neighbouring school and would require the removal of at least 40m of mature hedgerow. The additional cost and adverse environmental effects were not deemed justified as a smaller pitch would serve the school just as well. Shared use of the facility with Meopham Community Academy was also considered but also dismissed due to potential timetabling conflicts and educational challenges presented to Helen Allison school.*

GBC Highway Officer

- 3.11 In answer to the Highway Officer's specific questions the proposed MUGA will only be used by the school community with no public or commercial hiring of the pitch. To this end there will be no change to road access and parking at the school and no need to undertake a Transport Statement.

GBC – Environmental Protection Team (Regulatory Services)

- 3.12 The Environmental Protection Team raised three topics of potential concern;
- Light pollution
 - Nuisance to neighbours during construction; and
 - Contaminated land

- 3.13 Light pollution will not be an issue as no lights are proposed for the MUGA and its use will only be in the hours of daylight.
- 3.14 Construction nuisance is limited as there are no direct residential neighbours and construction is programmed for Summer 2023 when both the school and Meopham Community Academy are not in use.
- 3.15 Contaminated ground is not understood to be an issue with no recorded historical waste facilities on the site. However, this does not preclude the risk of unknown contamination such as builders' waste or polyaromatic hydrocarbons being discovered when the ground is opened up. The Contractor will be required to stop work and the school will seek rapid testing and certification of findings for contamination professionals to assess the risk and recommend an acceptable form of remediation.

Kent County Council Ecological Advice Service

- 3.16 Following receipt of the pre-application advice Hone Ecology were commissioned to undertake an ecological survey of the Site paying particular attention to the points raised. The resulting walkover survey letter report is contained as Appendix C to this Planning Statement.
- 3.17 With regard to the specific items raised the following responses are made;
- Preliminary assessment of the timber-framed structure for roosting bats and/or breeding birds – *the Hone Ecology survey showed no current roosting bats and a low potential for either summer or winter bat roosts and the same for local bird species.*
 - Assessment of the potential impacts of any proposed tree removal or pruning on roosting and foraging bats and/or breeding birds – *There is no proposed tree removal or pruning so no foreseeable impacts on foraging bats or breeding bird habitat.*
 - Assessment of the potential impacts of any proposed artificial lighting on biodiversity – *There is no artificial lighting proposed as the MUGA will only be used in daylight school hours so no need for any assessment of lighting effects.*
 - Assessment of the potential impacts of the site compound and works access route on tree-roosting bats and breeding birds – *the site delivery compound is planned for the front of the school on the existing tarmac car park with smaller plant delivering construction materials to the west side of the school. There are no foreseeable effects on tree-roosting bats should they become present or breeding birds.*

- Results of any additional surveys, and details of any mitigation required – *There are no additional surveys anticipated after the Hone Ecology walkover survey.*
 - Biodiversity Enhancements – Biodiversity enhancements have been recommended by Hone Ecology and are shown on the GA Plan held in Appendix D.
- 3.18 A Construction and Environment Management Plan (CEMP) will confirm that for hedgehogs no excavations will be left open overnight. It is highly unlikely that toads will be present on the amenity grass with more preferential habitat in the school's nature area and along the site hedgerows. However visual inspection of the grass to be excavated will be undertaken and any toads relocated to the nature area.
- 3.19 The CEMP will also confirm that the school's nature area is off limits for any construction activity or storage of materials or arisings from the works.

Measurable Biodiversity Gain and Enhancements:

- 3.20 The works will result in the loss of short grassland only as there will not be any loss or pruning of mature and semi-mature trees. We have taken into account the appropriate measures for the site that KCC Ecology Officer suggested and have responded this:
- Bat and bird boxes on buildings and trees – *bird boxes already exist within the school's nature area but additional ones will be fixed to boundary trees and a bat box to the main school building that is quieter and more likely to be inhabited;*
 - Wildflower planting and bee/insect boxes within suitable areas of the school site – *wildflower planting with a seed mix targeted to pollinating insects will be sown on the disturbed sides of the MUGA whilst a wall mounted insect hotel will be fixed to the side of the timber shed;*
 - Habitat piles for insects, reptiles and amphibians – *already exist within the school's nature area but will be replenished to encourage and retain colonisation; and/or*
 - A wildlife pond – *which is not suitable for some of the students at the school so will not be provided.*
- 3.21 The submitted Biodiversity Enhancement Plan has been informed by the results of the ecological impact assessment prepared by Hone Ecology.

4.0 Planning analysis

- 4.1 This section addresses the Officer's Analysis provided in the pre-application response drawing upon the comments made and providing the Green Belt exclusion commentary requested. Each of the Planning Officer's comments are addressed in turn.
- 4.2 The matter of valued landscape as referenced at §174 a) of the NPPF is also briefly touched upon to confirm the Site is not a valued landscape as defined by NPPF 174 a).

Principle of Development

- 4.3 We agree that Policy CS10 of the Gravesham Local Plan Core Strategy 2014 sets out 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. In this case the enhancement is to the physical infrastructure of the school's external realm for the benefit of students from across the Borough.
- 4.4 Thank you for directing us to Policy CS12 of the Gravesham Local Plan Core Strategy 2014 states that promotes a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors to be created, protected, enhanced and maintained. Although modest in nature there will be a Biodiversity Net Gain through the ecological measures proposed and the school's existing hedge, trees and nature garden are all protected and will continue to contribute to the wildlife stepping stones point of this policy.
- 4.5 Policy CS13 of the of the Gravesham Local Plan Core Strategy 2014 sets out that the Council will seek 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. Although arguably this policy and the evidence base it refers to is for publicly accessible leisure facilities we believe this policy is complied with as the existing poor, waterlogged play area is improved in quality and duration of use.
- 4.6 We note the GBC Leisure & Resilience Manager has not raised an objection to the proposal and provide the following additional information regarding the current use of the land and the reasons for the proposed surfacing change of the existing green open space.

- Typical season of use – after Easter holidays up to Autumn half-term;

- Reason not for use – waterlogging, students becoming dirty and dirt transfer into the school;
- No markings for games or other educational purposes existing at the moment; and
- No enclosure exists for safer games and educational activities.

4.7 These factors would change with a MUGA as it;

- Can be played upon all year round;
- Provide a cleaner surface with reduced transfer of dirt;
- Surfacing will accept sports and educational markings; and
- The enclosure will improve student safety and help facilitate more active sports use of the area.

4.8 The proposed development would result in the loss of an existing amenity grass area with the changed surface kept to green to appear more appropriate a surface colour in the school environment. The project's whole reason for development is to improve the facilities at the school. We are grateful for your opinion that the proposal would be in line with Policies CS10 and CS13 of the Gravesham Local Plan Core Strategy 2014 and acceptable in principle.

Green Belt

4.9 We understand that the south western part of the school campus where the proposed MUGA would be located is within the Green Belt, whilst the north eastern part is within a rural settlement (Meopham). Paragraphs 137 and 138 and 147-150 of the National Planning Policy Framework 2021 (NPPF 2021) and Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 are most relevant. The overriding policy approach in the Green Belt is that new built development is strictly controlled, in order to protect the openness of the land.

4.10 As clearly explained in the Pre-Application Note Paragraph 149 of the NPPF states '*that the construction of new buildings should be regarded as inappropriate development in the Green Belt*', but lists certain exceptions. One such exception (in 149(c)) is *the provision of appropriate facilities (in connection with the existing use of land or change of use) for outdoor sport and outdoor recreation* as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

- 4.11 Firstly, it is confirmed that no new buildings such as changing rooms or equipment stores are proposed that would reduce the sense of openness of the Green Belt. Secondly, we confirm that the provision of improved sporting facilities remains subservient to and incidental to the primary existing land use as a school. NPPF 149 c) is complied with as the openness of the Green Belt is preserved and the existing purpose of the land and this part of the Green Belt is retained.
- 4.12 We recognise that Policy CS02 of the Core Strategy 2014 prioritises development in urban areas as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements which GBC confirm is the case here, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy (LPCS). We consider that the proposals are compatible with the national Green Belt policy with regard to openness and the applicable policies in the LPCS.
- 4.13 In considering the five purposes of Green Belt as explained in the NPPF the proposals will have no effect as summarised below;
- To check the unrestricted sprawl of large built-up areas – *firstly Meopham is not considered a large built-up area and the MUGA does not extend beyond the school's existing, mature boundaries so there will be no sense of sprawl or intrusion into the nearby rural landscape.*
 - To prevent neighbouring towns from merging into one another – *there is no chance of this occurring with this change in surface type.*
 - To assist in safeguarding the countryside from encroachment – *as stated above there will be no sense of encroachment as the MUGA is retained within existing school boundaries.*
 - To preserve the setting and special character of historic towns – *not applicable.*
 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land – *not applicable.*
- 4.14 The proposed development would have wire rebound fencing set around it to keep balls within the MUGA. The fencing is visually lightweight and allows sight through it. The proposed height of the fencing is 1.8m tall which is low for ball stop fencing but considered acceptable for the planned games use. The existing tree and hedge lines around the school are visually

more enclosing than the proposed fencing. The proposed colour for the fence is dark green and matt in finish so that it visually recedes and blends with the existing mature vegetation. There are no other built aspects of the proposal such as changing rooms or kit stores to reduce the sense of openness.

- 4.15 The proposed ball stop fencing is a weld mesh fence, 1.8m tall with no solid rebound panels to ensure that they do not undermine the openness of the Green Belt. Standard details of this fence type have been provided by the manufacturer and typical images of the same set below.



- 4.16 We consider that the submitted proposal would be appropriate development in this part of the Green Belt and in line with paragraph 149 of the NPPF and Policy CS02 of the Gravesham Local Plan Core Strategy September 2014.

Design, Character and Appearance

- 4.17 We acknowledge reference to NPPF Paragraphs 130 and 134 and their direction for well designed proposals to reflect local design policies and government guidance on design. We have attempted to do this within the limited nature of these proposals.

4.18 Of more help to explain the proposals and their setting is Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 that sets out a series of ideal parameters for new development. Many of these are attributable to buildings rather than sports facilities but they have been reproduced below and the development's characteristics set against them;

- **Visually attractive** – The MUGA is not necessarily a scenic feature but it will appear tidy and well-built with consistent surface and fencing treatments.
- **Fit for purpose and locally distinctive** – The MUGA will be fit for children's play as required by Helen Allison School (no formal sports teams) but will not be locally distinctive as MUGA design is led by form following function and there are no real opportunities for vernacular materials or design detailing to make it locally distinctive.
- **Conserve and enhance the character of the built environment** – The built environment to the rear of the school is a collection of contemporary educational buildings with limited visual appeal, the proposals will conserve rather than compete with them visually and assimilate into the overall appearance of the school estate.
- **Take account of the scale, height, building lines and other architectural features of buildings** – Not considered wholly applicable but it is confirmed that the fencing of the MUGA will not rise above the ridge line of the school in any public views, is appropriate in scale within the campus and does not reduce the visual amenity to the rear of the school. In addition, the primary elevation of the school which faces Longfield Road remains unaffected with the MUGA set behind the school buildings.
- **Account should also be taken of strategic views and site topography** – There are no strategic views to be taken into account as none exist that take in this part of the school. The nearest potential publicly accessible views are from Footpath NS253 to the north west and south but these are screened by vegetation and if any change in view is sensed it will be Minor and Neutral in nature with the MUGA appearing as an appropriate feature of school grounds.
- **The significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place** – There are no known heritage assets affected by the works and the landscape features, namely the boundary trees and hedgerows that contribute to local character and visual amenity are all to be retained.

Meopham Downs Landscape Character Area

- 4.19 The application site is located in the Meopham Downs Landscape Character Area (LCA) and as such, Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.
- 4.20 As explained in the Pre-Application note the Meopham Downs LCA is characterised by a mixture of grazed pasture and arable land, with field shape and size being varied because of the topography of the area. Tree belts and native hedgerows with mature hedgerow trees form distinct boundaries.
- 4.21 The school's boundary trees and hedges, including the nature garden set near to the proposed MUGA will all be retained and the character of this part of the Meopham Downs LCA and the wider character area taken as a whole will be conserved. The MUGA will not appear as an incongruous feature as they are appropriate near schools. The lack of lighting will also respect the dark skies of this part of the village edge.
- 4.22 With regard to specific advice regarding fencing around the MUGA and as explained above it the weld mesh ball stop fencing will be open in visual character and finished in a dark green polyester power coating. Typically, this colour is referred to as British Racing Green with RAL Code 6005. It is a recessive colour and does not stand out against vegetation in the rural landscape scene as viewed from the rear of the school.
- 4.23 The fencing proposed is typical for MUGA courts and commonplace. The advantage of being visually open also allows school staff to monitor play on the MUGA without any hiding places for students. There will be no gates to avoid finger traps and to allow easy access to and from the MUGA.
- 4.24 It is considered that the built aspects of the proposal are appropriately designed and there would be no adverse impacts on the Meopham Downs LCA or the appearance of the school site and the proposal therefore comply with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014.

Neighbouring Amenity

- 4.25 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 its occupants and those of neighbouring properties.
- 4.26 The closest residential properties to the application site are nos. 1-15 Longfield Road, which are located to the north east. The GBC Environmental Protection Team (Regulatory Services) has raised concerns regarding the potential for adverse lighting impacts. As there is no lighting proposed with the MUGA, nor will there be in the future, there is no need to submit mitigation details for lighting overspill.
- 4.27 The proposal would be used in the same way as the existing grass surface, during the same school hours as currently exist. It is considered that noise would be no greater than at the moment and would occur at the same time of the day. There would be no extension of hours use into the evening as the MUGA is solely for student use in the school day.
- 4.28 Your pre-application note seeks the school to address the potential for adverse noise, disturbance and lighting impacts from additional vehicle/pedestrian movements associated with the proposed MUGA use. In short there will be none as the MUGA will be used by the existing student cohort in the school day. There will be no extra visitors who could potentially disturb neighbouring amenity.
- 4.29 There will be a small audio improvement with the reduction of grass mowing noise but this is perhaps a moot point as the rest of the grass at the school and to the playing field of the neighbouring Meopham Community Academy (MCA) school will still have to be cut generating noise. The MCA playing field is nearer to local residents.
- 4.30 We trust clarification of the above matters confirms compliance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Highways & Parking

- 4.31 Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1 and P3 of the Gravesham Local Plan First Review November 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. In short there is compliance with these policies and no need for additional parking as the MUGA is entirely for the use of students and their arrival and drop-off pattern will not alter.

- 4.32 The GBC Highways Officer has not raised an objection to the proposal, provided that the use of the MUGA is restricted to the school only. We confirm the MUGA is only for student use and no Transport Statement is required.

Biodiversity and Climate Change

- 4.33 Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 states that there will be no net loss of biodiversity in the Borough and opportunities to enhance, habitats associated with the wider school grounds have been taken.
- 4.34 Policy CS18 of the Gravesham Local Plan Core Strategy September 2014 seeks to ensure that the run off from new development has, as a minimum, no greater adverse effect than the existing situation and requires the use of SuDS where feasible. The new homes element of this policy is not applicable to this application.
- 4.35 Sustainable drainage has been taken by the provision of a porous surface system to the MUGA and setting two shallow swales to either side of the MUGA. These swales are the areas sown with wildflower grass seeding to further attenuate the water run-off and aid infiltration.
- 4.36 The KCC Ecological Advice Service advice has been followed with the provision of the suggested walkover ecological survey produced by Hone Ecology. The recommendations of the walkover ecology survey have been incorporated into the Environmental proposals. We also confirm there will be no impact on nocturnal fauna as there are no lights proposed.
- 4.37 We concur with your assessment that overall the proposed development would not be detrimental to ecology, biodiversity or surface water runoff and would comply with Policies CS12 and CS18 of the Gravesham Local Plan Core Strategy 2014.

Any Other Material Planning Considerations

- 4.38 As you confirmed in your Pre-Application response Public Right of Way – Footpath NS253 is set along the north western and southern boundaries of the application site. This path lies outside of the school grounds and would not be affected by the proposed development. To hopefully reassure the West Kent Public Rights of Way Officer we confirm that;
- There is no need to stop up, divert, obstruct or disturb the path surface disturbed;
 - There will be no encroachment on the current width, at any time now or in future;

- There will be no building materials or waste generated placed on or near the Public Footpath; and.
 - There is no need for furniture or fixtures to be erected on or across Public Rights of Way.
- 4.39 We note your advice that the application site is located in an area of multi-period archaeological potential but as you state it is unlikely that the proposed works would have a significant archaeological impact as construction build-up is limited to the top 150mm horizon of the ground.
- 4.40 Your pre-application note confirms the south eastern side of application site is located within Groundwater Source Protection Zone (GWSPZ) 3 and the north western side of the site is within GWSPZ 2. We agree with your assessment that it is unlikely that the proposed works would have a significant adverse impact to groundwater both in terms of volume as infiltration drainage is being proposed and water quality as no general fertilizer and herbicide application will no longer be required.
- 4.41 The presence of gas pipelines within the northern part of the school site and along the site frontage is noted and will be communicated to the Contractor in Pre-Works Health and Safety information. The Contractor will be directed to contact SGN (Southern Gas Networks) and National Grid to establish the exact location of this gas infrastructure prior to the commencement of any groundworks.

Summary of Pre-Application Note

- 4.42 In summing up the Pre-Application Note information the Planning Officer explained that there was as yet insufficient information to give a full assessment but with the material presented to them advised;
- The improvement of school facilities by the provision of a MUGA is acceptable in principle – *this confirmation of in principle development is helpful.*
 - Any future application must justify the loss of the open green space and address the Green Belt policy issues – *details of restricted use of the current amenity grass have been provided at 4.6 & 4.7 above.*

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- Any proposed fencing should be open in appearance and of a design and colour that is appropriate to the rural location – *the fencing will be open as illustrated and explained in 4.15 above.*
 - Any future application should address the potential for adverse impacts to residential amenity including adverse noise, disturbance and lighting impacts – *we do not consider there to be any additional adverse impacts to residential amenity as there is no change in land-use or increased hours of use across the day as explained at 4.25 above.*
 - Any future application should include a Transport Statement with particular reference to the availability of adequate on site car parking and which includes a site management plan, if a community use is proposed – *no Transport Statement has been submitted as there are no proposals for wider community use.*
 - Any future planning application should consider drainage and ecological impacts carefully (including providing appropriate ecological surveys and mitigation proposals) and provide habitat replacement/enhancements as part of the proposed development. It will be important to consider the impact of any proposed lighting on existing species – *The Hone Ecology walkover survey has been prepared, its recommendations included on the General Arrangement Plan and no lighting is proposed to affect existing species use of the area.*

5.0 Design considerations

- 5.1 **Location** – It is the only large enough, flat and secure location on the school campus to locate a MUGA.
- 5.2 **Access** – There is ready, secure access from the rear of the school with no need to form new accesses.
- 5.3 **Emergency Access** – Will remain the same down the side of the school to reach the MUGA in case of student injury or pass the east side of the MUGA in case of an evacuation of the school building e.g., in case of fire.
- 5.4 **Tree and Hedge Removal** – Not required.
- 5.5 **Pitch Size and Sports England Guidance** – The pitch size is 32 x 16m which is slightly smaller than Sports England Guidance, but this is considered acceptable to the school as they will not be holding formal sports matches on the pitch that need codified sizes.
- 5.6 **Surfacing Type** – Artificial grass with a sports bounce base has been selected to improve all-year round play and learning opportunities.
- 5.7 **Surfacing Colour** – Green to blend in and not appear discordant to the rear of the school and limit any sense of visual change from Footpath NS253.
- 5.8 **Fencing Type** – weld mesh, ball stop panels to maintain a visually open fencing type to retain student safety and maximise visibility and openness across the MUGA in this Green Belt location.
- 5.9 **Fencing Colour** – Dark Green RAL 6005 to minimise any chance of visual intrusion from Footpath NS253 and so that it blends with the existing vegetation set around the school boundary.
- 5.10 **Lighting** – None proposed as will only be used in hours of daylight.
- 5.11 **Drainage** – Porous pitch build-up with swales set to sides of pitch for surface water collection and infiltration.
- 5.12 **Ongoing Management** – To sports pitch manufacturers guidelines to retain warranty on surface.

6.0 Summary of Planning Policy Compliance and Conflict

- 6.1 In copying Table 1 the applicable policies from the Gravesham Local Plan Core Strategy 2014 as initially listed in Table 1 above we respectfully consider the scheme is compliant with all of the following local and national policies and no conflict has been found.

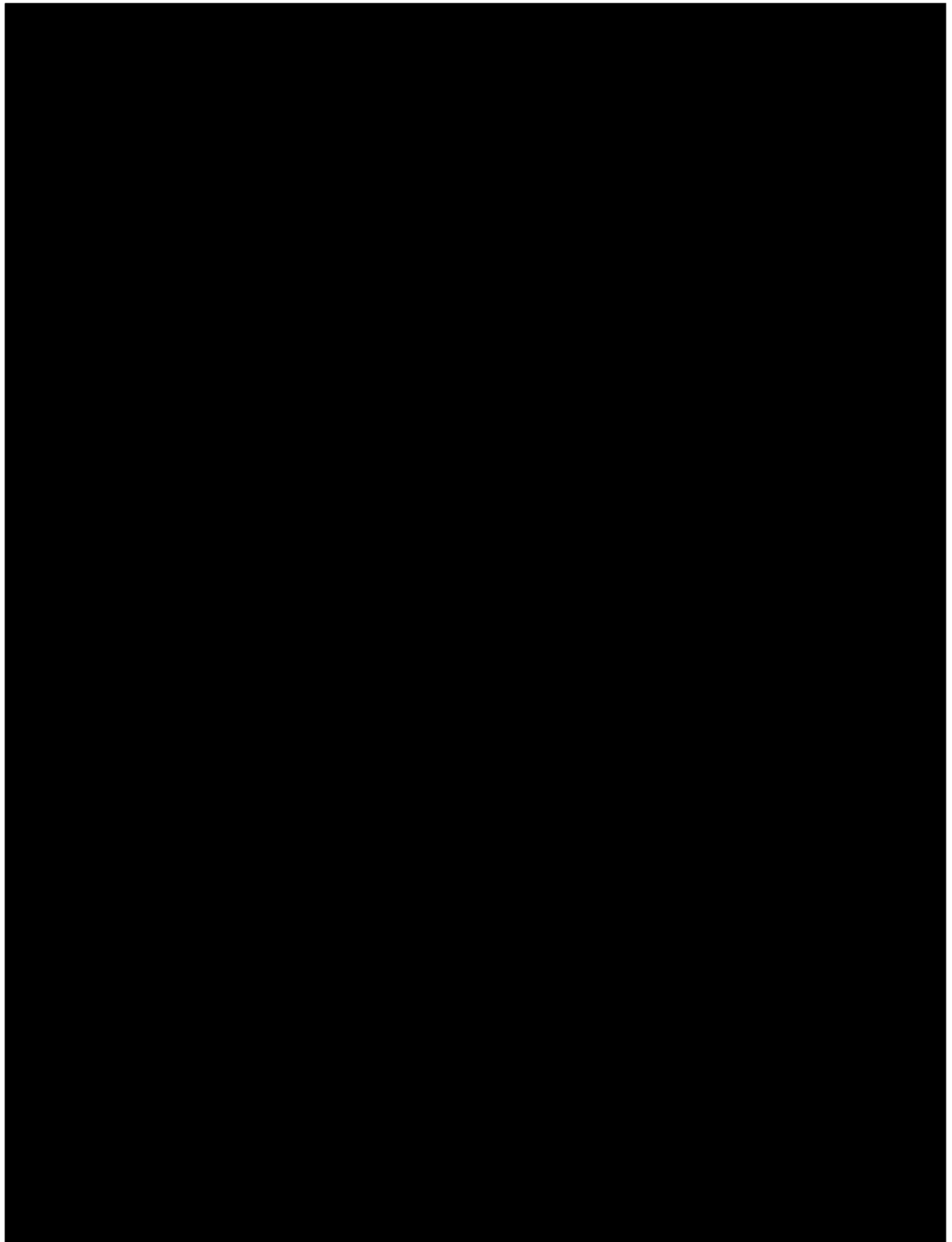
Table 2 – Policy Compliance

Policy from Pre-App Advice	Compliance or Conflict
Gravesham Local Plan Core Strategy 2014:	
CS01 Sustainable Development	Compliance
CS02 Scale and Distribution of Development	Compliance
CS10 Physical and Social Infrastructure	Compliance
CS12 Green Infrastructure	Compliance
CS13 Green Space, Sport and Recreation	Compliance
CS18 Climate Change	Compliance for the limited aspects that appear applicable
CS19 Design and Development Principle	Compliance
National Planning Policy Framework 2021:	
Section 2 Achieving sustainable development	Compliance
Section 8 Promoting healthy and safe communities	Compliance
Section 12 Achieving well-designed places	Compliance
Section 13 Protecting Green Belt land	Compliance
Section 15 Conserving and Enhancing the Natural Environment	Compliance
Supplementary Planning Guidance and other Documents	
Landscape Character Assessment (2009)	Conservation of immediate and wider landscape character of Meopham Downs LCA.

- 6.2 The Applicant trusts the submitted planning application conveys the nature of the proposed works and the limited change the works would have on the area. However, the benefits that the MUGA would deliver the school community are considerably larger and significantly and demonstrably outweigh any minor, adverse effects.

**Appendix A – Pre-Application Note from Gravesham
Borough Council – 24th January 2023**





the 1990s, the number of people in the UK who are employed in the public sector has increased by 1.5 million, from 2.5 million in 1980 to 4 million in 1999. The public sector has become a major employer in the UK, and its growth has been a key factor in the overall growth of the economy.

The public sector has also become a major provider of social services, and its growth has been a key factor in the overall growth of the economy. The public sector has become a major provider of social services, and its growth has been a key factor in the overall growth of the economy.

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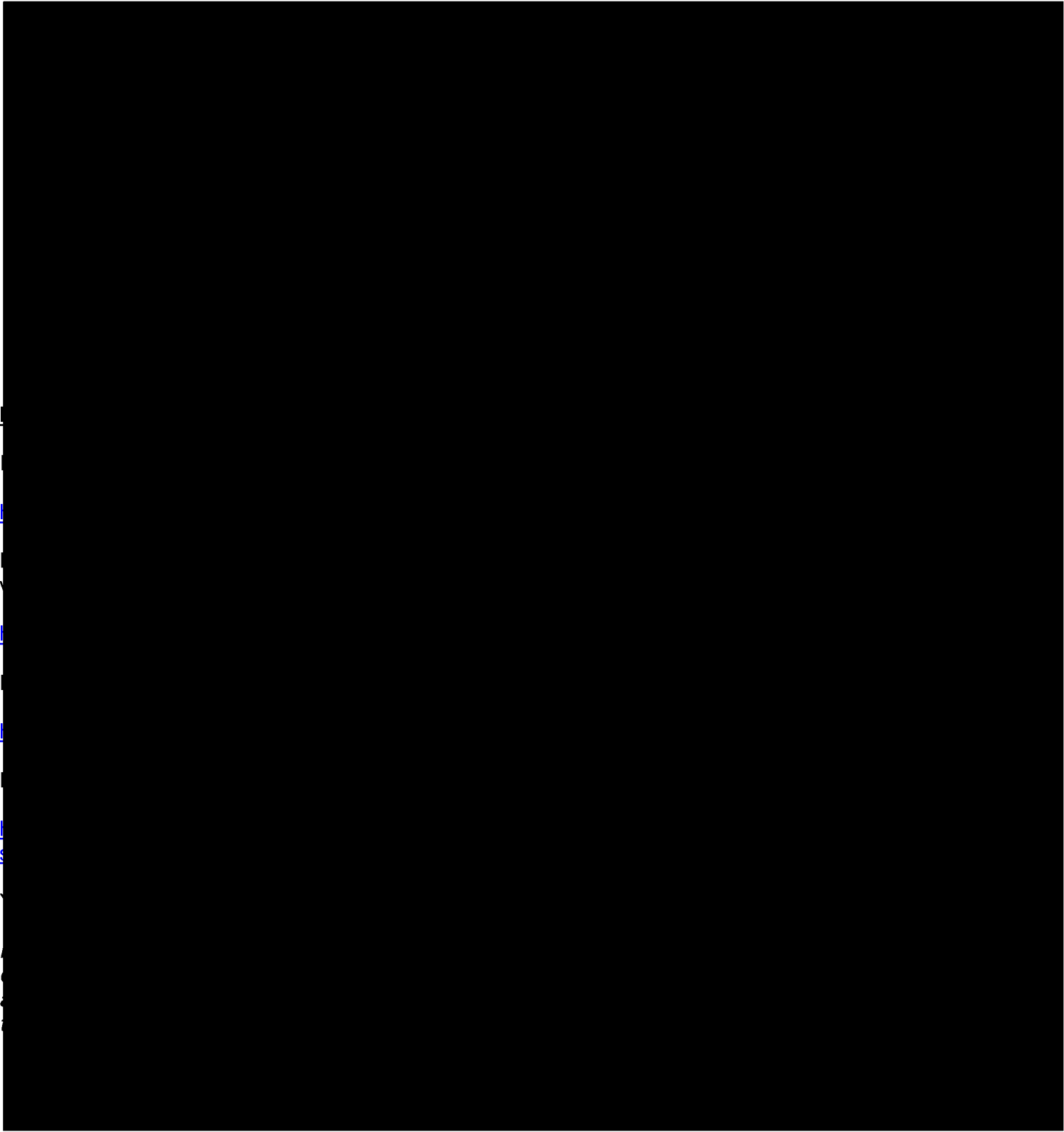
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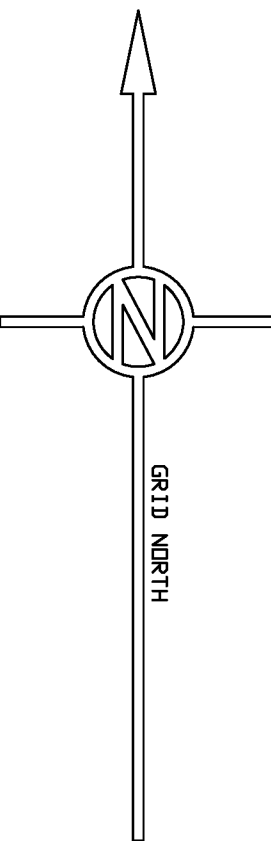
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Appendix B – Topographic Survey of the School







HELEN ALISON SCHOOL, MEOPHAM

CLIENT: RYDER LANDSCAPE

THE SURVEY: SHEET 1 OF 1
SCALE: 1:100
DATE: 10/03/2023

STANDARD REFERENCE:
BASIC LINE 1 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 2 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 3 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 4 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 5 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 6 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 7 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 8 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 9 - CORNER SURVEY POINT IN 10 10 10
BASIC LINE 10 - CORNER SURVEY POINT IN 10 10 10

ABBREVIATIONS:
CONCRETE: CON
TARMAC: T
GRASS: G
RUBBER CRUMP: RC
SETTS: S
ARTIFICIAL GRASS: AG
URNUAGE: U
FENCE: F
PATH: P
WALL: W
GATE: G
POLE: PO
LAMP: L
BENCH: B
BENCH MARK: BM
WATER POINT: WP
WATER METER: WM
WATER MAIN: WM
WATER PIPE: WP
WATER VALVE: WV
WATER TAP: WT
WATER METER: WM
WATER MAIN: WM
WATER PIPE: WP
WATER VALVE: WV
WATER TAP: WT
WATER METER: WM
WATER MAIN: WM
WATER PIPE: WP
WATER VALVE: WV
WATER TAP: WT

**Appendix C – Ecological Walkover Survey Letter Report by
Hone Ecology – 7th March 2023**



Sent by E.mail to: A [REDACTED]

7th March 2023

Ref no: E1936 010323

RE: Helen Allison School, Longfield Road, Meopham DA13 0EW

To whom it may concern,

Hone Ecology Ltd was requested to undertake a walkover survey of the land at Helen Allison School, Longfield Road, Meopham DA13 0EW (OS Grid reference TQ 64147 66672), where works are proposed to create a 32 x 16m MUGA within a recreational area of the school grounds. Experienced surveyor Julie Merrett attended the site on 1st March 2023 to survey the area of land impacted by the proposed works.

The proposed works area is a small rectangular area of regularly mown grassland. It is bordered by school buildings, playground and adjacent school recreational area to the north, east and west, line of deciduous trees, wooden shed and adjacent arable farmland to the south, and a small wildlife area with deciduous trees and rough grassland to the south west. Arable farmland lies out to the west and south of the school. The school is bordered by 3m high wire security fencing. Figure 1 shows a map of the planned works area within the school boundary.

Method

MAGIC Maps was reviewed for information on designated sites, woodland areas, great crested newt (GCN) records, and Natural England licence applications within a 1km radius from the site for the walkover survey. An extensive search of web-based information for the area was also undertaken identifying records of protected and other notable species of flora and fauna.

The walkover survey consisted of a survey of the proposed works area, and the school grounds (see Figure 1), surveying for field signs of protected species and habitats.

Site designations

The Kent Downs Area of Outstanding Natural Beauty (AONB) is approximately 885m to the west of the site (Figure 2). There were no other statutory designated sites such as Sites of Special Scientific Interest (SSSI) within 1km of the planned works. Due to distance and the limited nature of the planned works there is no impact to the AONB.

Woodlands

There are ten areas of woodland, and one traditional orchard within 1km of the planned works (Figure 3). The closest ancient woodland is approximately 735m to the west, primary habitat inventory deciduous woodland approximately 230m to the south, and traditional orchard approximately 820m to the east. Due to distance the limited nature of the planned works there is no impact to the woodlands or traditional orchard.

Walkover results

Vegetation

The planned works area is an area of regularly mown grass which is used recreationally. Due to the close mowing, it was not possible to identify grass species on the site, but daisy *Bellis perennis*, and springy turf-moss *Rhytidiadelphus squarrosus* were observed. At the south boundary of the site area

were a line of mature beech *Fagus sylvatica* and sycamore *Acer pseudoplatanus* trees, which it is understood are not impacted by the planned works (Plate 1). Due to its management and use, the area of planned works provides limited biodiversity or habitat potential.

To the south west of the site was a play area with a trampoline bordered by tarmac and mowed grass and moss (Plate 2). Adjacent to the south of this was a wildlife area (The Wilderness), which was a grassland with a layered mound, planted bulbs (daffodils *Narcissus sp.*, bluebells *Hyacinthoides sp.* and wood anemone *Anemone nemorosa*), and bordered by immature and semi-mature deciduous trees (Plates 3 and 4) including beech, hazel *Corylus avellana*, cherry *Prunus avium* and ash *Fraxinus excelsior*. The north and east boundaries of these areas consisted of immature and semi-mature deciduous trees and bushes, including honeysuckle *Lonicera periclymenum* (Plate 5).

The areas of the school to the north and north west of the planned works area consisted of developed land, including a playground (Plate 6), the school buildings with associated paving, and a car park to the north (Plate 7). There were planted borders and planters adjacent the school building containing introduced species (Plates 8 and 9). The car park was bordered to the north by predominantly non-native species hedges including *cotoneaster sp.*, but also sections of holly *Ilex aquifolium*, hawthorn *Crataegus monogyna* and privet *Ligustrum vulgare*, and two hawthorn trees (Plate 10).

	
Plate 1: Regularly mown grassland area of planned works, with line of trees on the south boundary.	Plate 2: Play area with trampoline to the south west of the planned works.
	
Plate 3: Wildlife area (The Wilderness) to the south west of the planned works.	Plate 4: Area of The Wilderness with planted bulbs.

	
Plate 5: North boundary vegetation of The Wilderness and trampoline play area.	Plate 6: Playground to the west of the planned works area.
	
Plate 7: School building and car park.	Plate 8: Introduced plant borders and planters adjacent the school building.
	
Plate 9: Planted border adjacent the school building.	Plate 10: Hedge on north boundary of car park.

Great crested newt

No survey licence return records for great crested newt (GCN) *Triturus cristatus* were identified within 1km of the site. Records of common toad *Bufo bufo* and smooth newt *Lissotriton vulgaris* were noted, but not on the site itself. There are no ponds on the site or school grounds themselves, and no ponds noted within 500m to support breeding amphibians.

The regularly mown grass within the planned works area provides sub-optimal habitat for amphibians, although there is some potential cover and foraging within the wildlife area to the south west of the planned works, and boundary vegetation of the school grounds. The site itself has therefore been assessed as negligible potential for GCN and other amphibians, and the adjacent wildlife area as low potential.

GCN's are afforded legal protection under Schedule 5 of The Conservation of Habitats Species Regulations (2010) (as amended). GCN are a European Protected Species (EPS). Common amphibians are afforded legal protection under the Wildlife & Countryside Act 1981 (as amended).

Reptiles

No records of common reptiles were identified within 1km of the site. The regularly mown grass within the planned works area provides sub-optimal habitat for common reptiles, although there is some potential cover and foraging within the small wildlife area to the south west of the planned works. The site itself has therefore been assessed as negligible potential for reptiles, and the adjacent wildlife area as low potential.

Common reptiles including slow-worm *Anguis fragilis*, common lizard *Zootoca vivipara* and grass snake *Natrix helvetica* are afforded legal protection under the Wildlife & Countryside Act 1981 (as amended).

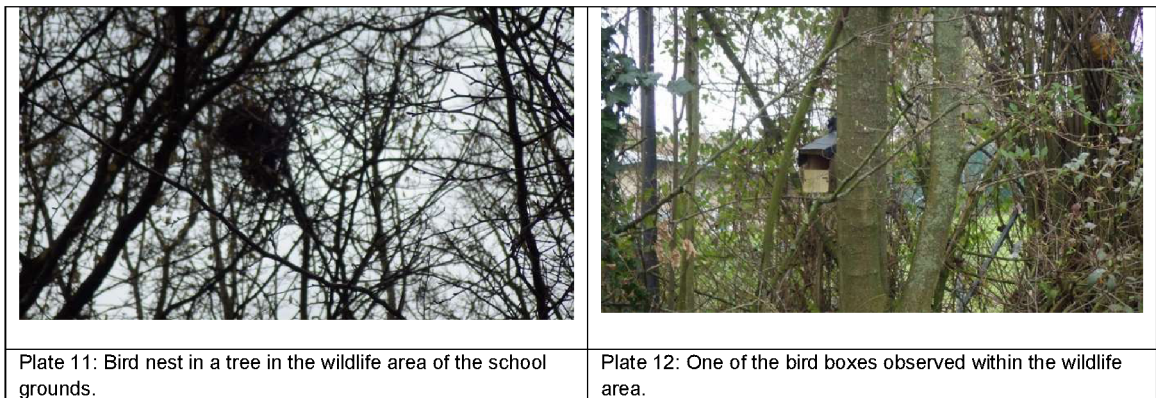
Badger

No signs of badger were observed on the site or bordering areas in the form of animal paths, setts, snuffle holes or latrines. The security fencing bordering the site provides a barrier to animals such as badger, fox and hedgehog. The proposed works area has therefore been assessed as negligible potential for foraging badgers.

Badgers are afforded legal protection under the Badgers Act 1992 and Schedule 6 of the Wildlife & Countryside Act 1981 (as amended).

Birds

The trees bordering the school property and trees and bushes within the wildlife area to the south west of the planned works area provide potential for nesting and foraging birds. A bird nest was observed within a tree in the wildlife area, and bird nest boxes were also observed in this area (Plates 11 and 12). It is understood that none of the trees on the site are impacted by the planned works.



All species of bird whilst actively nesting are afforded legal protection under the Wildlife & Countryside Act 1981 (as amended) and special penalties are available for offences related to birds listed on Schedule 1.

Bats

The habitat impacted by the works provides limited foraging potential for bats, and no bat roost potential in the form of raised bark, woodpecker holes or similar features were observed within the trees adjacent the works area on the site. The trees bordering the school and the wildlife area do provide some foraging potential for bats locally.

No potential roost features were observed on the wooden shed to the south of the planned works area. It is understood this shed is not impacted by the planned works.

The trees adjacent the planned works area, and the wooden shed were therefore assessed as having negligible potential for roosting bats. The site boundary area was assessed as having a low-moderate potential for foraging bats locally.

All species of bat are protected under the Wildlife and Countryside Act, 1981 (As amended) and are European Protected Species.

Other protected species

There is no potential for other protected species such as hazel dormice on the site due to the limited suitable habitat on the site, and lack of aerial connectivity to suitable woodland habitat in the wider area.

Invasive species

No signs of invasive species such as Himalayan balsam *Impatiens glandulifer* observed on the site or the surrounding area.

Recommendations

To retain the negligible potential for GCN, other amphibians and reptiles on the site itself, this area should continue to be regularly cut to maintain it at 5cm or less in height to ensure foraging and cover potential habitat for GCN and reptiles does not develop.

In the event any trees or bushes are to be removed as part of the planned works, this work should ideally be undertaken outside of the bird breeding season which extends from March to August inclusive. It should be noted however that certain species are known to breed throughout the year (e.g. pigeons) and remain protected. If this timing is not possible, a nesting bird check of the area to be cleared should be undertaken by an ecologist within 24 hours of the planned works starting to confirm no nesting birds will be impacted.

In the unlikely event that GCN, reptiles or other protected species are observed on the site during the works, works in that area must stop immediately and a suitably qualified ecologist contacted for advice.

It is understood that no lighting is planned for the MUGA. During construction of the MUGA, any lighting should avoid the boundary trees and vegetation to avoid impacting foraging bats in the area.

Enhancements

The grass area impacted by planned works provides limited biodiversity value. However, to increase biodiversity on the site and provide flowering plants for pollinators and butterflies, it is recommended that a wild flower area approximately 1.5m wide be sowed outside the west side and north west corner of the MUGA. It is understood the east side is required to access the fire exit for the school, and therefore no planting is recommended in this area. The sown areas should be cut twice a year, once in mid-summer, and then October to allow the flowers to produce seed for the next season. Cuttings should be removed from the area to avoid nutrient build up which will encourage invasive species and reduce biodiversity. The meadow seed mix would include local species, such as:

- Birdsfoot Trefoil *Lotus corniculatus*
- Burnet Saxifrage *Pimpinella saxifrage*
- Catsear *Hypochaeris radicata*
- Common Vetch *Vicia sativa*
- Eyebright *Euphrasia nemerosa*
- Fairy Flax *Linum catharticum*
- Knapweed *Centaurea nigra*
- Meadow Buttercup *Ranunculus acris*
- Meadow vetchling *Lathyrus pratensis*
- Oxeye Daisy *Leucanthemum vulgare*

- Pignut *Conopodium majus*
- Yellow Rattle *Rhinanthus minor*

To provide additional nesting potential for birds, it is recommended that two bird boxes be fitted to the mature trees at the south of the site.

It is also recommended that a bat box be fitted to the school building, in the area shown in Plate 13 in yellow below. This placing will ensure the box is not disturbed by school activities, and also that any bat droppings falling from it land on a roof away from the active areas of the school. Once in use by bats, bat boxes can only be inspected by a licensed bat worker. It is therefore recommended that a self-cleaning box such as a Kent bat box be used.



Plate 13: Recommended area on school building for bat box.

To provide hibernacula for any amphibians or reptiles in the local area, and foraging opportunities for insects, it is recommended that any logs from tree works be used to create log piles in the wildlife area, near the boundaries with trees.

Insect hotels could also be placed on the shed within the wildlife area to provide hibernacula and refugia for insects locally.

If you require further clarification on any of the above please do not hesitate to contact me.

Kind regards

Julie Merrett BSc (Hons) ACIEEM
Principal Ecologist
Hone Ecology Ltd
07399 861899

Figures



Figure 1: Site of proposed works shown in red, with school boundary in blue.

MAGiC

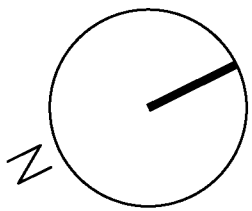
Statutory Designated Sites



Figure 2: Map showing the positions statutory designated sites in relation to (within 1 km) the planned works area.

Appendix D – General Arrangement showing MUGA and Ecological Enhancement Proposals



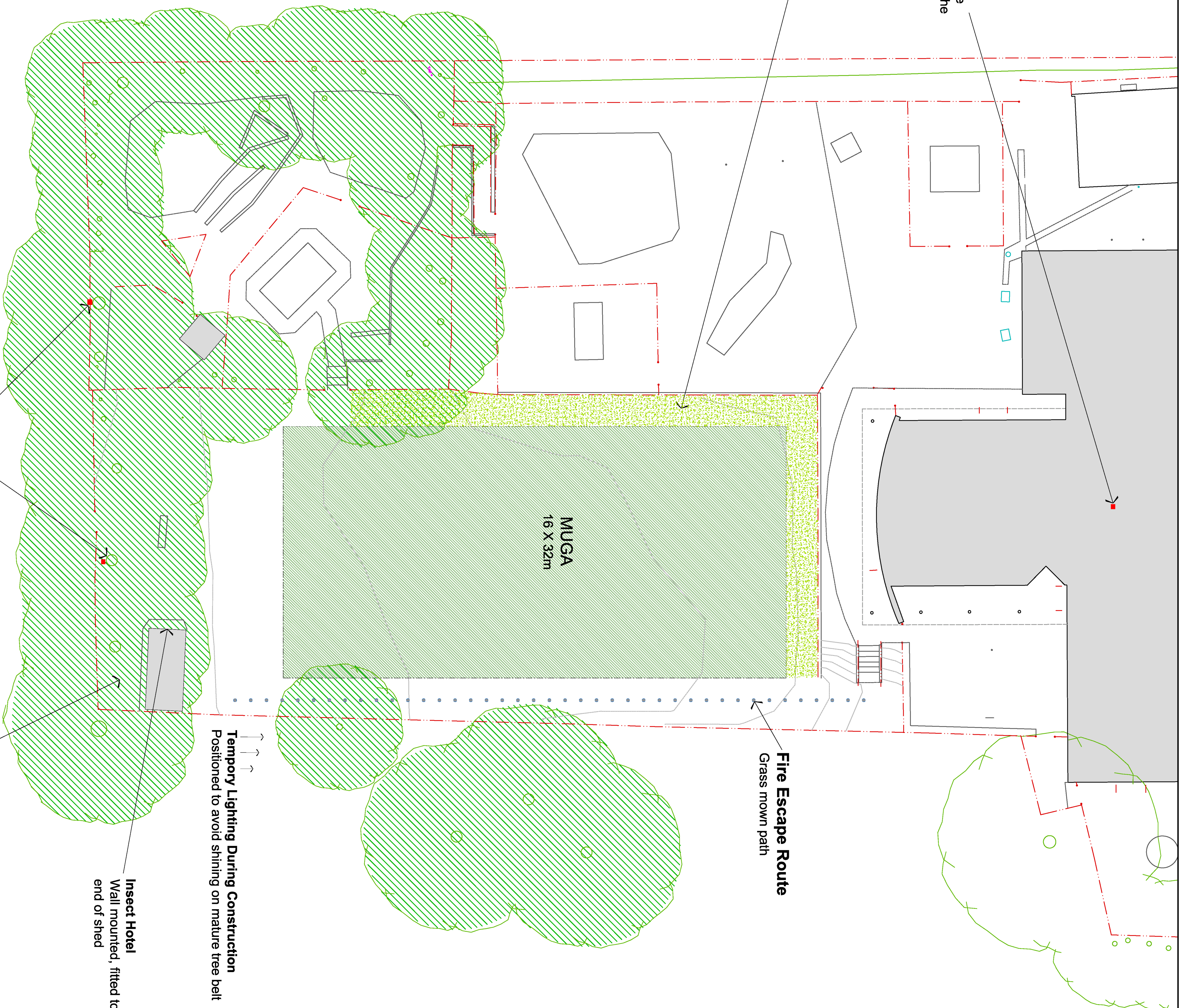


Bat Box

Self cleaning "Kent" bat box to be fitted beneath the roof apex on the main school building

Wildflower Margin

2m wide containing a mixture
flowering plants for pollinators
and butterflies



Proposed Ecological Interventions



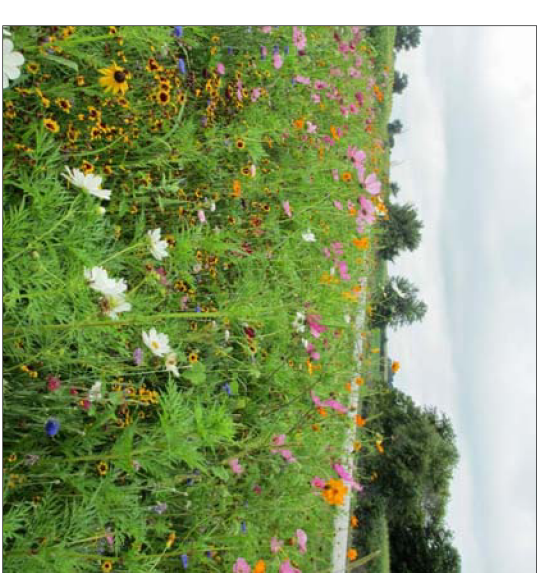
Tree mounted bird box



Tree mounted bird box



Building mounted bat box



Wildflower Margin

- [illegible]

Notes:

Drawing to be read in conjunction with ecological report by Hone Ecology
7.3.23

Wildflower grassland to be established using a locally sourced seed mixture that includes the following species:

Birdsfoot Trefoil *Lotus corniculatus*
 Burnet Saxifrage *Pimpinella saxifrage*
 Catsear *Hypochaeris radicata*
Hypochaeris radicata
 Common Vetch *Vicia sativa*
 Eyebright *Euphrasia nemerosa*
 Fairy Flax *Linum catharticum*
 Knapweed *Centaurea nigra*
 Meadow Buttercup *Ranunculus acris*
 Meadow Velchling *Lathyrus pratensis*
 Oxeye Daisy *Leucanthemum vulgare*
 Pignut *Conopodium majus*
 Yellow rattle *Rhinanthus minor*

Establishment of sward to be in accordance with seed suppliers recommendations, thereafter maintenance cuts to be undertaken in once in mid-summer and again in October.

FOR PLANNING

Rev	Drawn	Checked	Date	Description



I Byron Close, Hawarden Chester CH5 3TE
TEL: 01244 538548 EMAIL: info@ryderlandscape.co.uk
www.ryderlandscape.co.uk Company Registration no: 6065464

Client

National Autism Society

Project

Helen Allison School

Drawing Title

**Proposed MUGA Facility
Landscape General Arrangement**

Drawn By:	HC	Date:	230327
Checked By:	SR	Date:	230401
Drawing Scale:	1:150	Sheet Size:	A1
Drawing No.	000-RVD-XX-XX-DR-L-0001	Revision	-



MAGiC

Woodland



Figure 3: Map of woodland habitats in relation to (within 1 km) the planned works site.