



Delegated Report

Full Planning Application

Planning Application No: 20241003

Location: Hopehill Campsite Wrotham Road South Street Meopham

Description: Extension and alterations to existing toilet and shower block.

Applicant: Mr Fraser Patrick

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Planning Application Form;
Design and Access Statement
Drawing No. 1218/A/01 Rev B – Existing Location Plan, Layout & Roof Plan and Elevations;
Drawing No. 1218/A/02 Rev D – Proposed Layout Plan & Roof Plan and Elevations;
Drawing No. 1218-A-03A – Proposed Toilet / Shower Block – Layout Plan;
Drawing No. 1218/A/04 Rev A – Drainage Layout;
Drawing No. 1218-A-05 – Examples of Larch Cladding;
Statutory BNG File Note;
BNG Metric Calculation;
Bat Emergence and Re-Entry Surveys;
Tree Survey Report & Arboricultural Impact Assessment;
Preliminary Ecological Appraisal and Preliminary Roost Assessment; and
Sunpipe Sketch.

~~Drawing No. 1218/A/02 Rev C – Proposed Layout Plan & Roof Plan and Elevations~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20130338	Application for approval of condition 3 attached to planning permission reference number 20120956 relating to the disposal of waste water for replacement field kitchens.	Approval of Details	20.06.2013
20120956	Retention of the 10 structures comprising three ex-police cabins, two steel containers, temporary adult toilet block, rifle range, portacabin, shed and mobile caravan and erection of two replacement cabins for existing field kitchens.	Permission	10.01.2013
20060571	Erection of a clock tower on the roof of the Amenities Block.	Permission	20.09.2006

Development Plan

Gravesham Local Plan Core Strategy (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 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 12 – Achieving Well-Designed Places
- Section 13 – Protecting Green Belt Land
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Consultees

External

KCC – Heritage

The site lies within an area of multi-period background archaeological potential. However, based on existing Historic Environment Record data for the area and the past development of the site, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

KCC – Public Rights of Way

I can confirm that I do not have any objections to the above planning application at Hopehill Campsite. Public Right of Way Footpath NS268 runs along the northern boundary of the site then heads south and should be unaffected by the application.

KCC Biodiversity

We have reviewed the submitted ecological information and we advise that sufficient information has been provided to determine the planning application.

Protected/Notable Species

The ecological information has detailed that a peak count of 3 common pipistrelles have been recorded roosting within the building and at least 2 roosting locations have been identified within the building. In addition the report confirmed that there was evidence of brown long eared bats roosting within the loft space.

The report has detailed the following:

- Common pipistrelle day roost x 2 individual bats from the gap in the eaves at the northern elevation. These bats could be roosting in the gap itself or within the loft void. 2.
- Common pipistrelle day roost x 1 individual bat from the northwest corner, between the ridge and the roofing material.
- Brown long-eared day roost (multiple individuals judging from the number of droppings) at the ridge beam at the north-west end of the barn

The bat surveys were carried out at the end of the survey season and therefore it is possible that the surveys were too late to record a brown long eared maternity roost. However we are satisfied from reviewing the submitted site plans that the loft space will be retained and therefore brown long eared bats can continue to roost.

It is possible that the site supports a maternity roost and therefore additional bat surveys may be required to implement to inform the EPS licence. However as the loft will be retained we are satisfied that as it has been demonstrated that the loft will be retained the surveys are not required to inform the planning decision.

A European protected species mitigation (EPSM) licence will be required to carry out the proposed development due to the impacts upon roosting bats. The Conservation of Habitats and Species Regulations 2018 requires Gravesham DC the competent authority, to have regard to the requirements of the Habitats Directive in the exercise of their functions. As such, Gravesham BC must consider whether it is likely that an EPSM Licence from Natural England will be granted, and in so doing must address the three tests when deciding whether to grant planning permission for the proposed development. The three tests are that:

1. Regulation 55(2)(e) states: a licence can be granted for the purposes of *“preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”*.
2. Regulation 55(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied *“that there is no satisfactory alternative”*.
3. Regulation 55(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied *“that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”*

Gravesham BC need to be satisfied that the application adheres to the first two tests. Details of mitigation strategy has been provided to try and address test 3 and provide the necessary mitigation measures to maintain bats at a *“favourable conservation status”*. In summary, this includes the supervised removal of suitable roosting features, the avoidance of impacts from lighting and noise.

While we are satisfied with the principle and that GBC can be satisfied that the favourable conservation status will be maintained we advise that insufficient information has been provided to inform the detailed mitigation strategy. We advise that the final mitigation strategy includes the following:

- Incorporation of roost features within the building
- Avoidance of the maternity season to carry out the works.
- Measures to ensure that no light will enter in to the loft from the rooflights with sun pipes

We advise that if planning permission is granted we recommend the following condition:

Prior to works commencing within the site an updated bat mitigation strategy must be submitted to the LPA for written approval. The plan must include the following:

- *Updated bat emergence surveys (if required)*
- *Overview of mitigation required*
- *Detailed methodology to implement the mitigation.*
- *Plans demonstrating that the bat mitigation will be incorporated into the building.*
- *Details of any monitoring required.*

The plan must be implemented as approved.

Biodiversity Net Gain

Under the Environment Act 2021, all planning applications for major development (unless exempt^{1,2}) submitted on or after 12th February 2024 in England, will have to deliver at least a 10% biodiversity net gain. It is a requirement for minor applications, unless exempt, submitted on or after the 2nd April 2024.

Having reviewed submitted information, we consider this application to fall under mandatory biodiversity net gain so that mandatory biodiversity net gain of 10% will apply.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum³:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

We advise that sufficient information has been provided with regard to mandated BNG. The metric has detailed that currently the proposal will result in a loss of 100% BNG for habitats and the information details that less than 1 unit will be required to be purchased from an offsite provider to achieve BNG.

It is our view that habitat enhancements could be carried out within the wider blueline boundary to achieve a BNG of habitats of over 10%. We are satisfied that details can be provided within the biodiversity Gain plan. However we highlight that any habitat enhancements implemented within the blueline boundary must be secured via a legal agreement.

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.odt. The applicant should submit a biodiversity gain plan form4 along with supporting information once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered.

If on site BNG is proposed we advise that there will be a need for a habitat management and monitoring plan to be submitted with the biodiversity gain plan.

We recommend the following:

With the submission of the biodiversity gain plan a habitat management and monitoring plan must be submitted to the LPA for written approval. The plan must detail how any on site habitat creation and enhancement is managed and monitored in the long term. The plan must be implemented as approved.

Internal

GBC – Environmental Protection

There is no objection to this application. The application form advises that the foul sewage will be dealt with by connection to the main sewer – this is fine.

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that any external lighting installed is done so carefully so and not to illuminate anything other than the ground within a reasonable distance from the building.

GBC - Leisure

I am writing to confirm that I have no comments to make on the above application from a Leisure Services perspective.

Neighbouring properties

The application was publicised by the displaying of a site notice and individual letters sent to seven surrounding properties. No comments have been received.

Officer's Analysis

The application site is a Scout Campsite in Meopham. The site consists of four fields, three for camping and an activity field, as well as a large main building and a smaller toilet/shower block. The site can be used by up to 400 people (camping / day visitors) at peak times.



Proposal

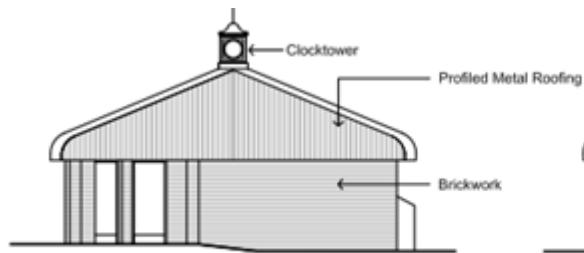
The application is for the erection of an Extension and alterations to existing toilet and shower block. The toilet block was erected at some point in the late 1980s / early 1990s.

This proposal seeks to extend the building by 53.7m², by increasing the length of the building by 6m, at a width of 8.95m. The development would also replace the roof, to create a hipped roof with 9no. rooflights. The clocktower will be relocated and centrally located.

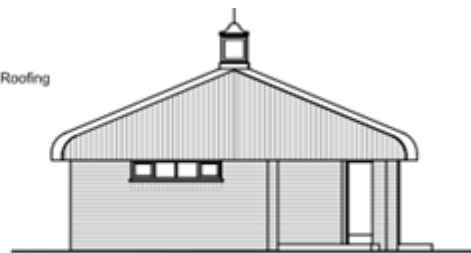
Existing Block



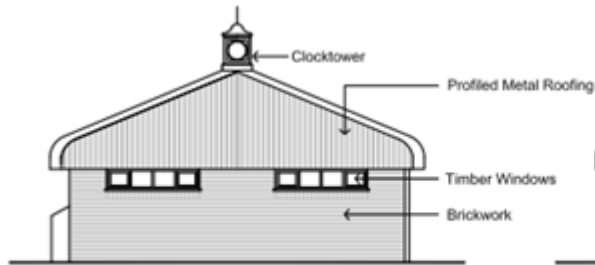
Existing Elevations



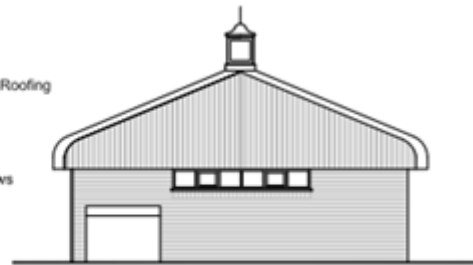
Front Elevation - View A - Scale 1-100



Side Elevation - View B - Scale 1-100



Rear Elevation - View C - Scale 1-100

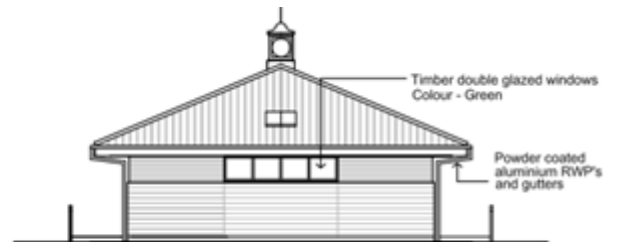


Side Elevation - View D - Scale 1-100

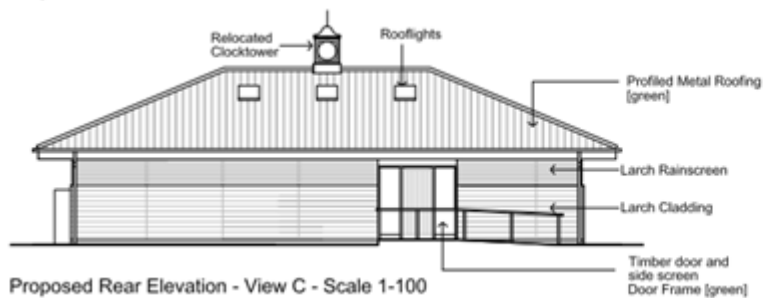
Proposed Elevations / Floor Plans



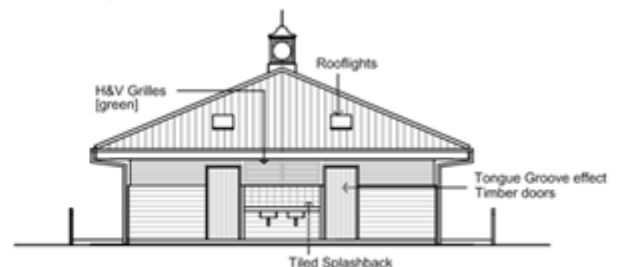
Proposed Front Elevation - View A - Scale 1-100



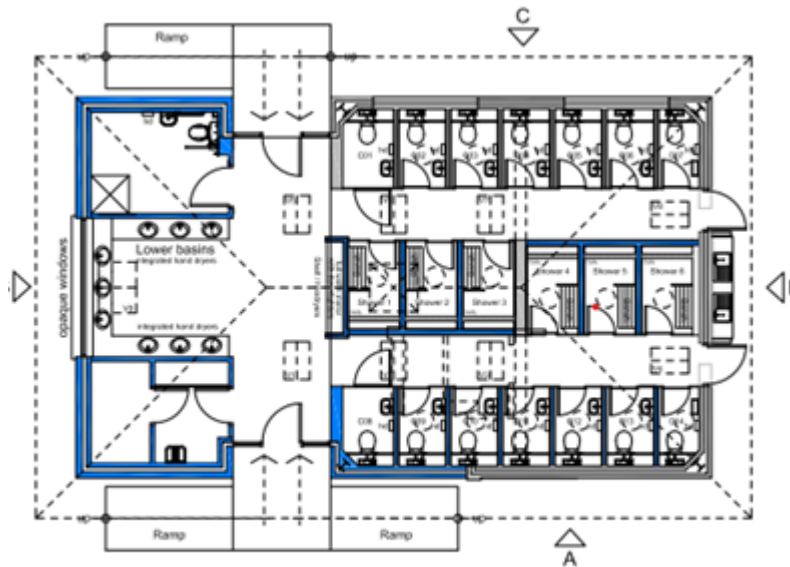
Proposed Side Elevation - View B - Scale 1-100



Proposed Rear Elevation - View C - Scale 1-100



Proposed Side Elevation - View D - Scale 1-100



Proposed Toilet / Shower Block Plan - Scale 1-100

Principle of Development

The application site is located in the Green Belt and as such Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) is relevant. Development in the urban area is prioritised as the sustainable location for development. In the rural area, Policy CS02 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, i.e. in the Green Belt, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the LPCS.

There are five principle issues in determining this application;

- Appropriate development in the Green Belt
- The effect of the proposal on the openness of the Green Belt;
- Any Very Special Circumstances
- Impact on the Landscape;
- Design, Character and Appearance;
- Amenity
- Parking and Highways
- Any Other Material Planning Considerations – Biodiversity Net Gain

Appropriate Development in the Green Belt

There are strict policy considerations within the Green Belt whereby paragraph 153 of the National Planning Policy Framework (NPPF) (2024) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 goes on to say that very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it falls within the specified exceptions. The relevant exception to consider for this application is part c of paragraph 154 of the NPPF (2024), which states that it may be acceptable to extend or alter a building provided it does not result in disproportionate additions over and above the size of the original building.

The proposed extension to the building would increase its footprint by 53.7m², which is representative of a 63% uplift. While local planning policy does not have a set figure for extensions to non-residential buildings,

it does place a one third limit on extensions to dwellings in saved policy C13 of the Local Plan First Review (LPFR) (1994), which can be applied as a baseline for this proposal. Using saved policy C13 as a baseline, the extension hereby proposed would exceed the one third limit and in purely numerical terms would potentially represent a disproportionate addition over and above the original building.

However the numerical calculation forms only a part of the overall assessment. Paragraph 154 of the NPPF (2024) states that it may be acceptable to extend or alter a building provided it does not result in disproportionate additions over and above the size of the original building. It does not provide a figure.

The proposed extension is large, increasing the depth of the building by 6m which is representative of an 67% increase. However, the design of the building is not disproportionate and would appear balanced, with hipped edges and a pitched roof reducing the overall bulk. Moreover, the extension would retain the characteristics of the original building, with continuity of height and this serves to further reduce the perceived bulk and create a proportionate appearance.

Overall, it is considered that the proposal would not represent a disproportionate addition to the original building and therefore would satisfy exception c of paragraph 154 of the NPPF (2024).

The effect of the proposal on the openness of the Green Belt

Paragraph 142 of the NPPF (2024) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence.

The site is located within the countryside and the building that this application relates to is in an isolated part of the field, located away from the main building. Any new built form of development is likely to impact on the openness of the Green Belt, however it is important to establish the degree of harm. Openness of the Green Belt has both a spatial and visual aspect. As discussed in the above section, the proposed extension would significantly increase the footprint of the building, with the depth increasing by approx. 67%. Therefore in spatial terms, by virtue of the scale of the extension over and above the original building, would have a harmful, eroding impact on the openness of the Green Belt increasing the spread of built form within the Green Belt

In visual terms, the extension is located to the front of the building, and although this means that it would experience greater visibility, the development would not alter the appearance of the building and would not result in any increase in height or visual bulk. As a result of this, the proposed development would have limited impact on the visual openness of the Green Belt.

Overall, even though the development would result in a net increase of built form within the Green Belt, which by its very nature causes erosion to the open permanence of the landscape, the extension has been designed to match the existing character of the building and the continuity of appearance serves to limit the impact on the visual openness. Therefore, on balance, the extension is not considered to have a detrimental impact on the openness of the Green Belt.

Reference back to paragraphs 153 of the NPPF (2024) informs us that inappropriate development in the Green Belt should not be approved except in very special circumstances and that very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Whether the development causes any other harm and whether there are any other relevant considerations to balance the overall planning argument, should now be considered.

Any Very Special Circumstances

No specific arguments have been put forward by the applicant in relation to the assessment of 'very special circumstances', with the exception of the development providing a modern shower/toilet facility which in

turn would support the campsite as a whole, further securing its operation and future.

Impact on the Landscape

In addition to being within the Green Belt, the site is located within the Meopham Downs Landscape Character Area. This area is characterised by gently undulating topography with a mix of arable and pasture farmland, three large settlements located along the A227 and traditional architecture surrounding village greens providing local vernacular.

Policy CS12 (LPCS) seeks to protect the Green infrastructure within the Borough and states at 5.7.26 the overall landscape character and valued landscapes will be conserved, restored and enhanced.

The proposal will extend an existing building within the site, utilising similar materials and is therefore not considered to have a detrimental impact on the Meopham Downs Landscape Character Area.

The development would therefore accord with Policy CS12 (LPCS) and Section 15 of the NPPF (2024).

Design, Character and Appearance

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area. Moreover, Section 12 (Achieving well-designed places) of the NPPF (2024) sets out that developments should function well and add to the overall quality of the area, be visually attractive and sympathetic to local character.

The extension has been designed to match the character of the existing building, with a similar roof profile and height but with a more contemporary appearance by removing the curved eaves. The extension would be constructed using similar materials which serve to further improve the continuity of appearance. There is no objection to the proposal in terms of design.

The development would therefore accord with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring properties and land and Section 12 of the NPPF (2024) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The proposed development would not result in any change of use of the land and would deliver improved facilities for the operation of the land. Therefore, it is not expected to result in an uplift of visitors and would not create any additional impacts on the amenity of surrounding residents in terms of noise, etc. For future users of the site, the development would improve their amenity with purpose built and up to standard washing/wc facilities.

Overall, the proposal is considered to safeguard amenity in accordance with local and national planning policy.

The development would therefore accord with Policy CS19 (LPCS) and paragraph 135(f) of the NPPF (2024).

Parking and Highways

There are no parking or highways issues related to this proposal. The development would not result in any increase in visitors to the site and as such, the demand for parking would not be impacted by the proposal.

Any Other Material Planning Considerations

Ecology

The submitted supporting documentation states that evidence of roosting bats are present within the existing roofspace which is currently boarded. The proposed extension seeks to include boarded to provide dedicated bat areas and the rooflights are served by sunpipes, as can be seen from the following image:

This provision is deemed to be acceptable as details in KCC Biodiversity's comments, subject to condition.

Biodiversity Net Gain

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The proposed development is subject to the biodiversity gain condition which will be attached to any forthcoming decision.

It is considered that habitat enhancements could be carried out within the wider blueline boundary to achieve a BNG of habitats of over 10% and that details can be provided within the biodiversity Gain plan.

Conclusion

Subject to conditions, specifically relating to ecology and biodiversity, the application is in accordance with local and national policy and is recommended for approval.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	A Cue	Signed:	R Hart
Dated:	7 th February 2025	Dated:	10 th January 2025