



Delegated Report

Approval of Conditions Application

Application No:	20221174
Location:	Metropolitan Police Specialist Training Centre, Mark Lane, Gravesend, Kent, DA12 2HN
Description:	Application for approval of conditions 3, 4 and 5 attached to planning permission reference number 20211541 relating to archaeological field evaluation works in accordance with a Written Scheme of Investigation along with any safeguarding measures to ensure preservation of important archaeological remains and/or further investigation and recording (3 i, ii), a detailed sustainable surface water drainage scheme (4) and a lighting design plan for biodiversity (5).
Applicant:	The Mayors Office For Policing And Crime (MOPAC)

Submitted Documents/Plans

- Application Form - dated 19/10/2022;
- Cover Letter - dated 12/01/2023;
- Planning Statement - dated 15/11/2022;
- Supplementary Information - Flood Risk & Drainage Assessment (ref. A111364) from WYG Engineering;
- Supplementary Information - Storm Network Report (1-4 pages) from Geosmart Information Ltd - dated 13/01/2023;
- Supplementary Information - Storm Network Report (1-7 pages) from Geosmart Information Ltd - dated 13/01/2023;
- Supplementary Information - Archaeological Deposit Model Report from MOLA - dated 26/05/2023;
- Drawing no. MP-A1-MM-14 - Rev. 00 - Drainage Plan;
- Drawing no. 77443.02-100 - Rev. P02 - Proposed Surface Water Drainage Layout;
- Drawing no. GRCT-64C-001 - Site Plan Road Levels and Layout Plan 1;
- Drawing no. GRCT-64C-008 - Rev. C1 - Site Layout Landscape Plan (showing position of culvert);
- Drawing no. 00-DR-EL-1000 - Rev. T01 - Proposed Ground Floor Lighting Layout Training Range;
- Drawing no. 00-DR-EL-1001 - Rev. T01 - Proposed First Floor Lighting Layout Training Range;
- Drawing no. 00-DR-EL-1002 - Rev. T01 - Proposed Second Floor Lighting Layout Training Range;
- Drawing no. 00-DR-EL-2000 - Rev. T01 - Proposed Lighting Layout Ancillary Building;
- Drawing no. 1002 - Rev. C01 - External Lighting Levels Plot.

Relevant Planning History

Reference	Description	Decision	Decision Date
20211541	Erection of a new concrete live fire skills house training building (plus abseil frame) with new ancillary support building and associated works.	PERMITTED	11.02.2022

Consultations

External Consultees

Environment Agency - Thank you for consulting us on the above application. We remove our objection to the discharge of condition 4.

We attended a meeting with the applicant to discuss our previous objection to the discharge of this condition and have reviewed the drawing submitted by the applicant (Drawing titled "Site Layout Landscape Plan", reference GRCT-64C-008", revision C1, dated 07.01.03). Based on the information presented we are able to remove our objection to the discharge of this condition. This is due to the applicant being able to demonstrate that there will not be a detrimental impact on the main river culvert that flows to the south of the development site.

We understand that the applicant believes that the main river line is incorrect and that the main river culvert lies to the north of the development site. At this stage, we are unable to agree with this. If the applicant wishes to challenge the main river line, they will need to submit more detailed information, including but not necessarily limited to, plans and surveys to evidence this. This does not change our decision on the discharge of this condition and we are therefore able to recommend the discharge of condition 4 (surface water drainage).

Natural England - Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.

Kent County Council (Flood and Water) - Kent County Council as Lead Local Flood Authority have reviewed the submitted information and have no objection to the discharge of condition 4.

We would recommend that Gravesham Borough Council as the LPA seek confirmation from the applicant that Southern Water has provided consent to discharge surface water into the existing manhole at 2 l/s via a new connection.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Kent County Council (Biodiversity) - We have reviewed the submitted documents in relation to condition 5 and advise that sufficient information has been provided to discharge the condition.

Further to our previous advice note, the salient information has been provided, including times of operation which states lighting will be automatically turned off at 11pm.

Kent County Council (Heritage) - Many thanks for sending the deposit model report by MOLA on the geoarchaeology of the site. Yes, I would be happy for the planning condition to be discharged in full on this basis. I will save this copy to the Kent HER for future reference/research.

Internal Consultees

GBC - Environmental Protection (Regulatory Services) - Only Condition 5 (lighting) falls within the remit of Environmental Protection. Although Condition 5 refers to the impact of lighting on residential amenity, there do not appear to be any residential premises within the vicinity of the training facility. In this respect, therefore, there is no impact.

Looking at the original application, the request for a lighting condition as made by KCC's Ecological team in respect of any ecological impact on the RAMSAR/SSSI site. If this hasn't already been sent to KCC for consultation, I would recommend that it is.

Officer's Analysis

This is an application for the approval of conditions 3, 4 and 5 attached to planning permission reference 20211541 relating to archaeology, sustainable drainage and biodiversity.

Condition 3 states the following:

3. *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of:*
- i. *archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority; and*
 - ii. *following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority.*

A geoarchaeology deposit model report has been undertaken by MOLA and Kent County Council Heritage are happy for the condition to be discharged in full on this basis. As such, the condition has been satisfied and can be discharged.

Condition 4 states the following:

4. *Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the Local Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment prepared by Atkins dated December 2019 and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.*

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

- *that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters;*
- *appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.*

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

There is no objection to the sustainable surface water drainage scheme for the site from the Environment Agency or Kent County Council (Flood and Water). As such, the condition has been satisfied and can be discharged.

Condition 5 states the following:

5. *Prior to completion/first use, a lighting design plan for biodiversity will be submitted to, and approved in writing by, the local planning authority. The plan will show:*
- *The type and locations of external lighting;*
 - *The expected light spill in lux levels;*
 - *The expected times of operations; and*
 - *That areas to be lit will not have adverse impacts on biodiversity.*

All external lighting will be installed in accordance with the specifications and locations set out in the plan and will be maintained thereafter.

There is no objection to lighting design plan for the site in relation to biodiversity from Kent County Council

(Biodiversity). As such, the condition has been satisfied and can be discharged.

Recommendation

Approval of Conditions

Case Officer:	Mr Ethan Bonthron	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	13 th June 2022	Dated:	13 June 2023