

Our Ref: 02C400264

28 August 2024

Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Dear Sir / Madam,

Planning Application Submission | North Kent Police Station, Thames Way, Northfleet, Gravesend, Kent, DA11 8BD

Avison Young have been appointed by Kent Police to prepare and submit a full planning application to Gravesham Borough Council (GBC) in relation to the provision of four Air Source Heat Pumps (ASHP) at their North Kent Police Station on Thames Way in Northfleet, Gravesend.

For context, when the North Kent Police Station (NKPS) was initially constructed in 2007, the heating and cooling system that was installed was a Ground Source Heat Pump (GSHP) solution. Following the installation of the GSHP, from October 2008 onwards, there have been a number of leaks within the below ground pipework linked to the GSHPs, which have resulted in the GSHP system being unable to provide sufficient heating and cooling to the wider police station building.

As the pipework was installed below the building and car park respectively, it is impractical to excavate these areas in order to replace the pipework. Due to the failure of the existing GSHP and the need for NKPS to continue operations, a temporary space, heating and cooling solution has been implemented. A temporary diesel fired boiler, air cooled chiller and diesel generator have been installed on site while a permanent replacement solution is explored.

Whilst a number of options were considered as a suitable replacement for the GSHPs, it was agreed that the most suitable solution was deemed to be an ASHP. This was due to their ability to be located above ground, enabling the units to be repaired and maintained for their full-service life of the plant, whilst also being energy efficient, and in keeping with the original sustainability intentions of the previous GSHP solution. A Technical Note has been prepared in support of this submission and should be read in conjunction with this cover letter.

Pre-Application Advice (Ref. PRE20240168)

A submission was made to the Local Planning Authority (LPA) to discuss the provision of ASHPs at the Site and to understand their acceptability moving forward. An on-site meeting took place on the 12th of August, with the Case Officer's formal written advice received on the 27th of August, a copy of which is enclosed as part of this letter.

Within the formal written response, the Case Officer has confirmed that the principle of development is considered to be acceptable. The new raised plant deck, which supports the four new ASHPs, is to be located at the rear of the police station building, within the car parking area. The plant deck would be enclosed by acoustic louvres, which have a similar appearance to the existing cladding on the building, limiting its visibility and serves to blend the development within the building itself, whilst limiting noise spill to sensitive receptors. Therefore, the proposal is considered to be acceptable in terms of design.

The proposed development would provide a sustainable, long-term solution to heating/cooling of the police station building and, in the view of the Case Officer, is in accordance with local and national policy.

Planning Policy & Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map (September 2014)
- Saved policies in the Gravesham Local Plan First Review (November 1994)
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020)

National Planning Policy Framework (2023)

Paragraph 11 of the NPPF sets out that plans and decisions should apply a presumption in favour of sustainable development, which, for decision making, means approving development proposals that accord with an up-to-date development plan without delay, or, where there are no relevant development plan policies.

Paragraph 157 provides guidance in that the planning system should support the transition to a low carbon future in a changing climate. Furthermore, **Paragraph 164** sets out that, in determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic, including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights.

As set out in the NPPF, the planning system should seek to support the transition to a low carbon future, and the provision of ASHPs in this location is therefore acceptable. Furthermore, and in accordance with Paragraph 164, their provision to assist with the heating and cooling of the Police Station should be given significant weight.

Gravesham Local Plan Core Strategy (2014) (Relevant Policies)

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

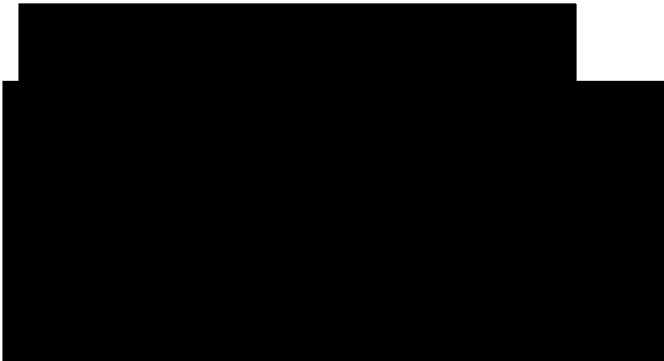
The Gravesham Local Plan Core Strategy was adopted in September 2014, within which **Policy CS18** denotes that the Council will seek to reduce the overall carbon footprint of the Borough, as well as supporting stand-alone, decentralised, renewable or low carbon energy development where it is compatible with national and local plan policies.

The provision of the ASHPs by Kent Police will replace the existing temporary solution that has been implemented at the Police Station for a number of years. Their location will not be impacted by any local designations and therefore, is considered acceptable in accordance with **Policy CS18** of the Local Plan.

This application is supported by a Noise Impact Assessment (NIA) Technical Note. During discussions with the Case Officer on-site during the pre-application meeting, it was considered unlikely that the development would impact on the amenity of surrounding occupiers given that the nearest residential property was approximately 150 metres away to the east, albeit a significant amount of car parking provision and existing, mature woodland is in-between, helping to reduce any noise impact that would be generated by the proposal.

In summary, it is considered that the proposed replacement of the existing, temporary heating and cooling system with ASHP is acceptable and accords with both national and local planning policies, and that planning permission should be granted accordingly.

Yours sincerely



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Enclosed Documents

- Technical Note
- Noise Impact Assessment (Sharps Redmore)
- PRE20240168 Pre-Application Response