PLANNING APPLICATIONS COMMITTEE

Wednesday, 20th July, 2022

10.00 am

Council Chamber, Sessions House, County Hall, Maidstone

AGENDA

PLANNING APPLICATIONS COMMITTEE

Wednesday, 20th July, 2022, at 10.00 am
Council Chamber, Sessions House, County Hall, Maidstone

Ask for: **Emily Kennedy**
Telephone: **03000 419625**

Membership (13)

Conservative (10):	Mr A Booth (Vice-Chairman), Mr C Beart, Mrs R Binks, Mr P Cole, Mr D Crow-Brown, Mr M Dendor, Mr H Rayner, Mr O Richardson, Mr C Simkins and Vacancy
Labour (1):	Ms J Meade
Liberal Democrat (1):	Mr I S Chittenden
Green and Independent (1):	Mr P M Harman

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public

A. COMMITTEE BUSINESS

1. Substitutes
2. Declarations of Interests by Members in items on the Agenda for this meeting.
3. Minutes - 15 June 2022 (Pages 1 - 4)
4. Site Meetings and Other Meetings

B. GENERAL MATTERS

1. General Matters

C. MINERALS AND WASTE APPLICATIONS

D. DEVELOPMENTS TO BE CARRIED OUT BY THE COUNTY COUNCIL

1. SE/22/645 Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP (KCC/SE/0036/2022) (Pages 5 - 30)

2. GR/22/110 Proposed 2-form of entry expansion, involving the erection of a new freestanding 2-storey school building, new staff car park, new parent car park and drop off/pick up area, together with associated access, signage and landscaping works at Meopham School, Wrotham Road, Meopham, Gravesend, Kent DA13 0AH (KCC/GR/0014/2022) (Pages 31 - 94)

E. MATTERS DEALT WITH UNDER DELEGATED POWERS

1. Matters dealt with under delegated powers (Pages 95 - 98)

2. County Council developments

3. Screening opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2017

4. Scoping opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2017

F. KCC RESPONSE TO CONSULTATIONS

1. Paddock Wood Neighbourhood Plan (2022-2038) - Regulation 14 Consultation (Pages 99 - 160)

G. OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
General Counsel
03000 416814

Tuesday, 12 July 2022

(Please note that the draft conditions and background documents referred to in the accompanying papers may be inspected by arrangement with the Departments responsible for preparing the report.)

KENT COUNTY COUNCIL

PLANNING APPLICATIONS COMMITTEE

MINUTES of a meeting of the Planning Applications Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Wednesday, 15 June 2022.

PRESENT: Mr A Booth (Vice-Chairman), Mrs R Binks, Mr P Cole, Mr D Crow-Brown, Mr M Dendor, Mr P M Harman, Ms J Meade, Mr H Rayner, Mr O Richardson and Mr C Simkins

ALSO PRESENT: Mr Stepto

IN ATTENDANCE: Mr Jim Woodridge (Principal Planning Officer - For Head of Planning Applications), Ms M Green (Principal Planning Officer), Paul Hopkins (Principal Planning Officer), Adam Tomaszewski (Senior Planning Officer), Lidia Cook (Senior Planning Officer), David Joyner (Transport & Development Planning Manager), Nagla Stevens (Principal Solicitor, Invicta Law), Emily Kennedy (Democratic Services Officer)

UNRESTRICTED ITEMS

1. Apologies
(Item)

Apologies were received from Mr Chittenden.

2. Minutes - 20 April 2022
(Item A3)

RESOLVED that the Minutes of the meeting held on 20 April 2022 are correctly recorded and that they be signed by the Chairman.

3. Site Meetings and Other Meetings
(Item A4)

It was noted that there would be a site visit on 18 July 2022 at Sheerness Docks and details would be confirmed outside of the meeting.

4. General Matters
(Item)

Jim Wooldridge advised that the Levelling Up and Regeneration Bill which proposed a number of significant changes to the planning system had been laid before Parliament. He also referred to the briefing material that the Head of Planning Applications had circulated to Committee Members.

5. Application TM/21/1269 (KCC/TM/0090/2021) - Installation of a ground mounted solar photovoltaic (PV) array and associated infrastructure at Land at Offham Landfill Site, Teston Road, Offham; Infinis Solar Developments Ltd
(Item C1)

1) Mr Tomaszewski, Case Officer, outlined the report.

2) Dr Charles Unter (Offham Parish Council) addressed the Committee in opposition to the proposal. Ms Claire Hannan (Infinis) spoke in reply as applicant.

3) During discussion on this item, the Committee agreed to add an Informative encouraging the applicant to participate in liaison meetings with Offham Parish Council and work with FCC Environment as landowner to ensure that the tree screening around the perimeter of the landfill site is well maintained and, where possible improved. It also agreed that references in the officer report to Three Mile Lane be corrected to Seven Mile Lane.

4) Further to questions and debate, Mr Rayner proposed, the Chairman seconded and Members RESOLVED that:

(a) the application be REFERRED to the Secretary of State for Levelling Up, Housing and Communities under the Town and Country Planning (Consultation) (England) Direction 2021 and that SUBJECT TO no intervention by him that PLANNING PERMISSION BE GRANTED SUBJECT TO the prior satisfactory completion of a legal agreement to secure the Heads of Terms set out in Appendix 1 and conditions covering amongst other matters: Development to be commenced within 3 years of the date of the permission; Carrying out the development in accordance with the submitted plans; Restriction of permitted development rights; Temporary planning permission for a period of 35 years from the date of energisation (the date of first energisation shall be notified to the Local Planning Authority in writing); Submission and approval in writing of a decommissioning method statement at least six months prior to the completion of the 35 year energisation period; Submission and approval in writing of a decommissioning method statement in the event that the export of electricity to the grid ceases for a period of 6 months (unless relating to a temporary cessation resulting from the need to remediate localised differential settlement or in connection with the ongoing management of landfill gas or leachate at the landfill site), or within six months following a permanent cessation of construction works prior to the solar facility coming into operational use; The site shall be restored in accordance with the approved restoration and aftercare scheme, or any consent which subsequently varies or replaces it, following decommissioning; No energisation shall take place until the submission and approval in writing of full details of the proposed route of the permissive path including, surface, gates and fence; Submission and approval in writing of a Construction Management Plan prior to commencement of development; Submission and approval in writing of a Landscape and Ecological Management Plan; Submission and approval of a lighting scheme; Submission of a landscaping scheme prior to commencement of development; Tree protection measures; Construction hours only between 07:00 and 18:00 hours Monday to Friday and between

07:30 and 13:00 hours on Saturdays (with none on Sundays, Bank and Public Holidays), unless otherwise approved by the County Planning Authority; Repairs and maintenance only between 07:00 and 18:00 hours Monday to Saturday (with none on Sundays, Bank and Public Holidays), unless otherwise approved by the County Planning Authority (where there is insufficient time to secure prior approval for urgent repairs or maintenance the operator shall notify the County Planning Authority of the date, time, reason for and nature of the works on the next available working day); Submission of a scheme within 24 months of energisation to demonstrate that no erosion/scarification of the grassland between the arrays has occurred. In the event of evidence of erosion or scarification, mitigation details shall be submitted and approved in writing by the County Planning Authority; and

(b) the applicant be advised by Informative that:

1. The development would require a permit from the Environment Agency, so it is recommended that the applicant contacts the National Permit Service on 03708 506 506 to discuss the issues likely to be raised.
2. Planning permission does not convey any approval to carry out works on or affecting the public highway.
3. It should explore the opportunities for community engagement, with particular focus on engaging with pupils at Offham Primary School to promote and enhance understanding of the benefits associated with renewable energy generation.
4. It is encouraged to participate in liaison meetings with Offham Parish Council and work with FCC Environment as landowner to ensure that the tree screening around the perimeter of the landfill site is well maintained and, where possible, improved.

6. Proposal TM/22/203 (KCC/TM/0248/2021) - Single storey sixth form centre and a new sixth form classroom block at The Judd School, Brook Street, Tonbridge: The Judd School
(Item D1)

1) Mary Green, Principal Planning Officer outlined the report and proposal.

2) The local Members, Mr Hood and Mr Stepto had commented on the application. Mr Stepto read a statement from Mr Hood in addition to his own comments.

3) Mr Doleman (Pod Developments – Agent) and Mr Wood (Head Teacher) addressed the Committee in support of the proposal.

4) Further to questions and debate, Mr Rayner proposed, Mr Richardson seconded and Members agreed that

(a) Permission be granted to the proposal subject to conditions relating to the standard 3 year time limit; the development carried out in accordance with the permitted details; the development to be carried out using external materials and colour finishes as specified within the planning application documents, unless

otherwise agreed; No development shall take place until a construction management plan, including lorry routing, access, parking, construction vehicle loading/unloading and circulation within the site for contractors and other vehicles related to construction operations, measures to prevent mud and debris being taken onto the public highway, has been submitted for approval and thereafter shall be implemented as approved; Hours of working during construction to be restricted to between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays; Retention of the 'Vizards' car parking area for the sixth form and staff parking only during school hours in perpetuity; 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 County Planning Authority; No development shall take place until information is provided to demonstrate that an effective outfall for surface water is provided for the development layout; and , no building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the County Planning Authority.

(b) the applicant be advised by Informative that:

1. The applicant is required to obtain any necessary highway approvals.
2. The Judd School to be encouraged to open up a dialogue with Sussex Road Primary School regarding the Judd's playing field, its all-weather pitch and potential drainage matters experienced by the Primary School.
3. The applicant is strongly recommended to consider the addition of solar panels to the two sixth form buildings as and when budgets permit and to consider the possibility of a green roof.

7. Matters dealt with under delegated powers
(Item E1)

RESOLVED to note matters dealt with under delegated powers since the meeting on 20 April 2022 relating to:-

E1 County matter applications
E2 County Council developments
E3 Screening Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017
E4 Scoping Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

8. Land at Possingham Farmhouse, Great Chart
(Item F1)

RESOLVED to note Kent County Council's response to the consultation on Land at Possingham Farmhouse, Great Chart (Item F1)*)*

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP - SE/22/645 (KCC/SE/0036/2022)

A report by Head of Planning Applications Group to Planning Applications Committee on 20th July 2022.

Application by Broomhill Bank School (North Site) for the re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP- SE/22/645 (KCC/SE/0036/2022)

Recommendation: Permission be granted subject to conditions.

Local Member: Mr Perry Cole Classification: Unrestricted

Site

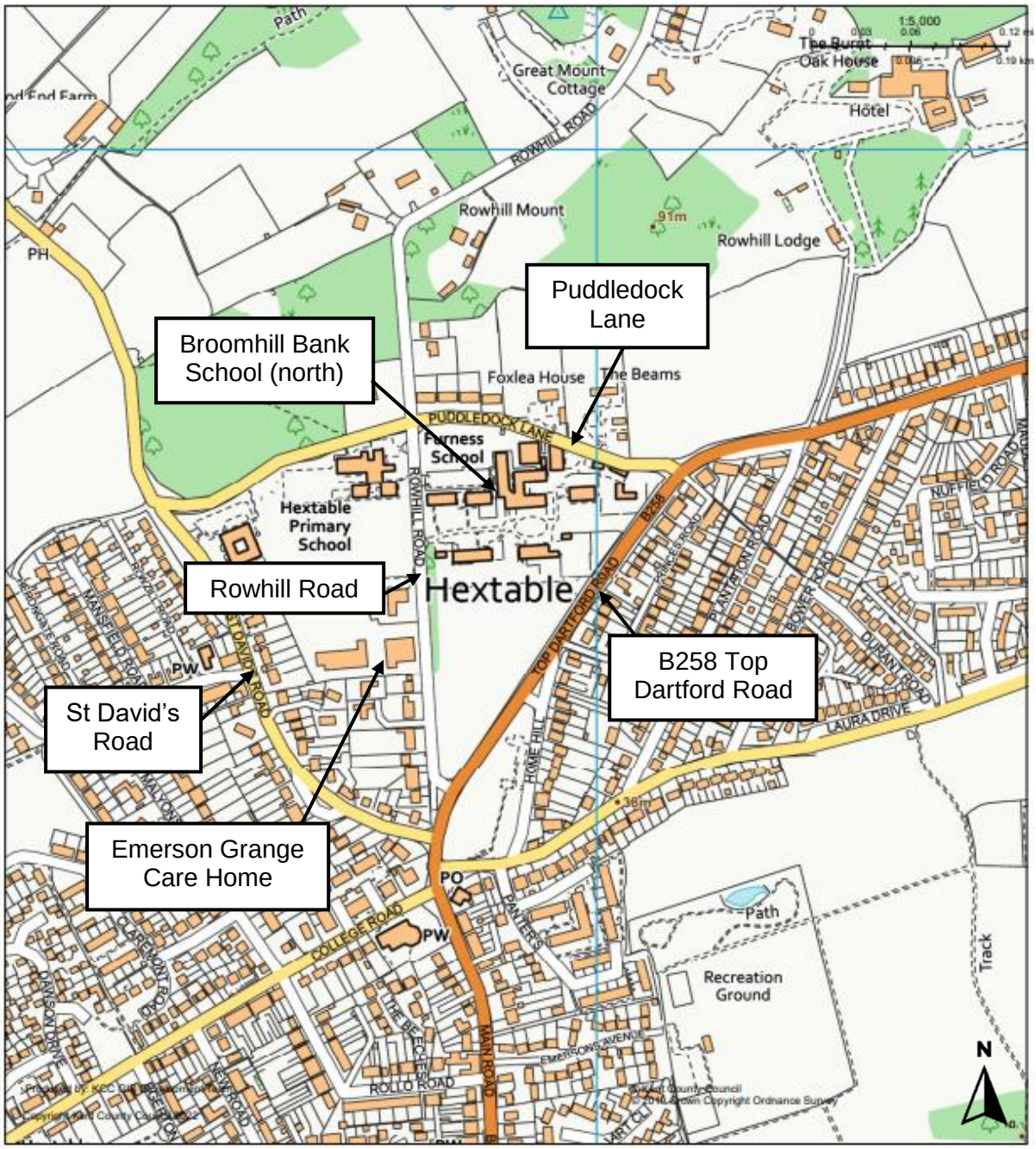
1. Broomhill Bank School is a mixed Special Educational Needs (SEN) School for students who have an Educational Health Care Plan (EHCP) relating to their communication and interaction difficulties. The school provides SEN provision for pupils aged between 11 and 19 who have communication and interaction difficulties associated with autism, speech, language and communication needs. Broomhill Bank School is a split-site school comprising two sites within Kent, with this application relating to the northern site located in Hextable near Swanley.

2. Broomhill Bank School (north) is located within the village of Hextable, approximately 1.5 miles north of the town of Swanley. The school site is situated in a triangular piece of land located between the B258 Top Dartford Road, Puddledock Lane and Rowhill Road. The school is accessed via Rowhill Road to the west of the site, and also includes a secondary access via Puddledock Lane to the north. The school site covers approximately 4.15 hectares and comprises a car park, residential accommodation and existing main school buildings to the north, and a playing field to the south. It is situated adjacent to Hextable Primary School and Emerson Grange Care Home to the west, and residential properties to the north and east.

3. The proposed area of development is situated on an existing developed area to the north of the school site, adjacent to Puddledock Lane. The Metropolitan Green Belt is located north of the school site, the development is not within this. A site location plan is attached.

Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP - SE/22/645 (KCC/SE/0036/2022)

Site Location Plan



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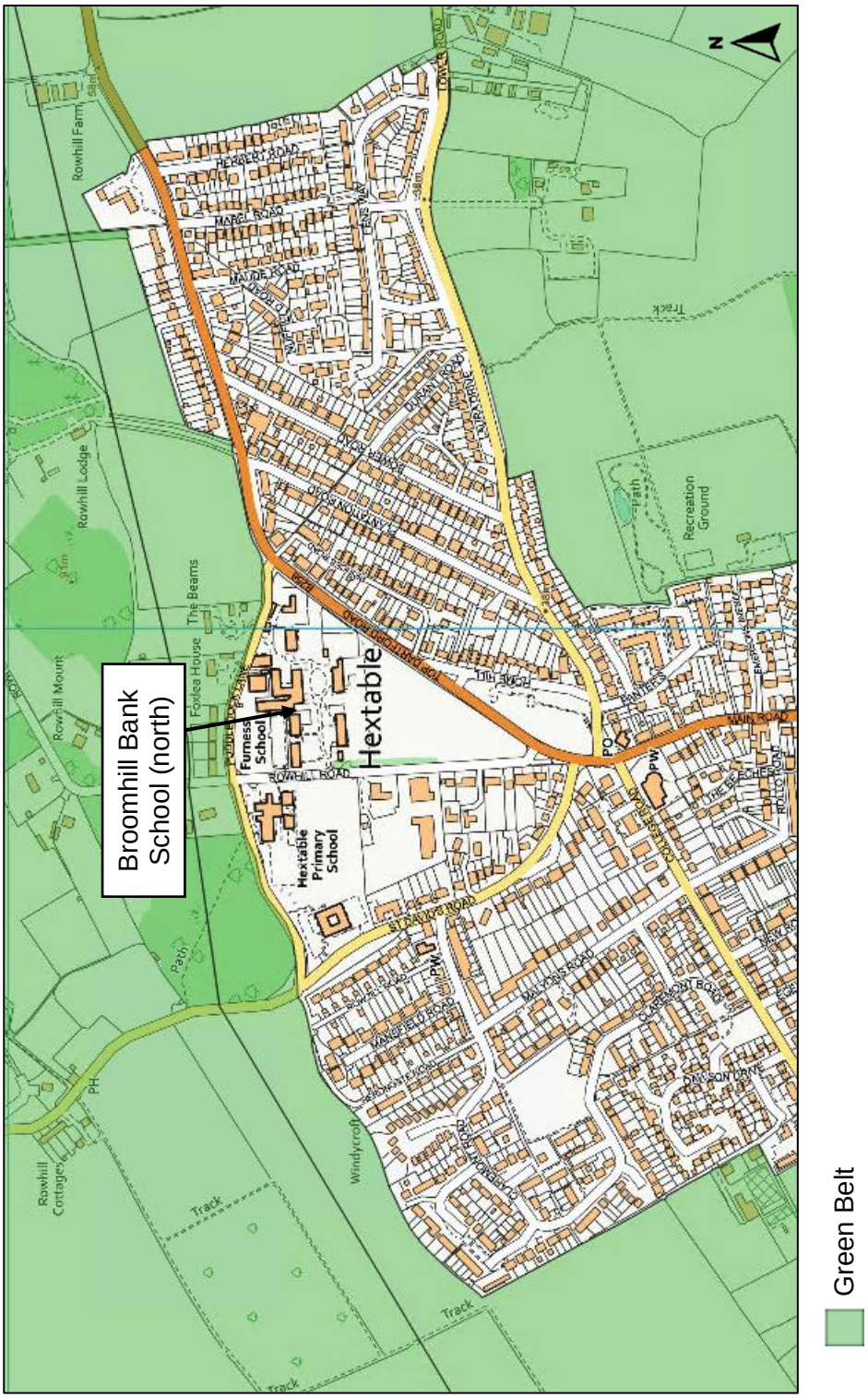
Green Belt Location Plan



Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP - SE/22/645 (KCC/SE/0036/2022)

Recent Planning History

4. The school site was previously known as The Furness School which provided Special Educational Needs (SEN) schooling for students with a special educational need or disability. Due to insufficient demand and the requirement of educational improvements, The Furness School was proposed to be closed. In 2015, Broomhill Bank School took over the running of The Furness School. The school site became a satellite of Broomhill Bank School which has an existing site located in Tunbridge Wells, with the handover of the school site taking place in September 2015, and sixth form opening in September 2016.

5. The most relevant recent site planning history is listed below:

SE/85/1910	Provision of a sports hall and changing accommodation Granted with conditions 15 April 1986
SE/05/1275	2-storey extension to the main existing teaching block to provide science, admin facilities, general teaching spaces and ancillary accommodation. Linked to this is a single storey art block. Single storey technology store extension to the courtyard area of the main existing teaching block. Corridor link to same area to provide circulation between main teaching block, new extension & access to ICT/dining facilities. New vehicular/pedestrian access off Rowhill Road and provision of a new car park for 48 no. spaces. Relocation of 4 no. mobile classrooms and eventual removal from site. Removal of 11 no trees. Granted with conditions 2 August 2005
SE/10/2277	Demolition of single storey garage. Erection of single storey practical cookery building (east of the Simon Harrison Centre) including ancillary works. Granted with conditions 29 September 2010

Proposal

6. This planning application seeks permission for the modernisation and refurbishment of the existing sports hall building, together with the demolition of the existing swimming pool building and ancillary building, and replacement with a dedicated sports and changing room facilities building. The proposed development area would be located at the very northern end of the existing school site on an existing developed area, adjacent to Puddledock Lane.

7. The application proposal seeks to retain the existing sports hall building at the north of the school site. The application documents set out that the existing sports hall building is in a poor state of repair requiring much needed improvement and is proposed to be re-cladded with a profiled panel system in a grey finish.

8. The application also includes the demolition of a single storey swimming pool and associated building, and ancillary sports building at the north of the school site, east of the existing sports hall building. Partial demolition of the existing swimming pool building, and ancillary building has already been undertaken by the school due to the roof beginning to collapse and exposed asbestos causing significant health and safety concerns. Further demolition works are however required to complete demolition of the buildings, including the foundations, and therefore remain as part of the planning application.

9. Following the completion of the demolition works to the swimming pool and associated building, and ancillary sports building, the application proposes to erect a 372 square metre single storey replacement building partly to the rear of the existing sports hall building to the north, and partly to the east of the existing sports hall building, adjacent to the northern secondary access from Puddledock Lane. The replacement accommodation would serve as an extension to the existing sports hall building and would largely constitute a replacement of the existing facilities/built development on site already, situated predominantly on the extent of the existing hardstanding/building area of the buildings that would be demolished. The replacement buildings would comprise a lobby area, a fitness suite, two changing rooms, a separate facility room and associated lobby/entrance, toilets to the east of the existing sport hall and storage/sports rooms to the north.

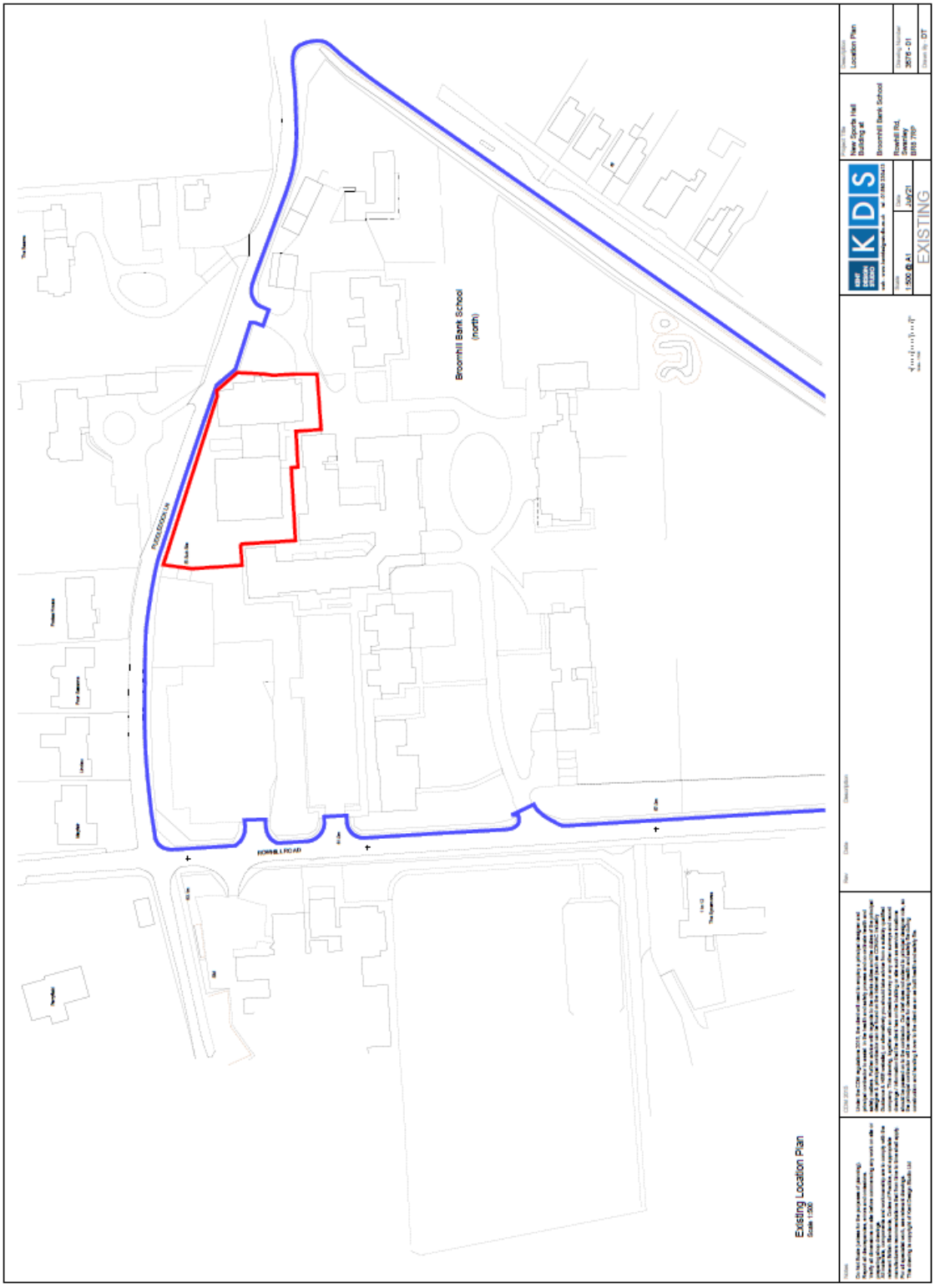
10. The application proposes to retain the existing hedgerow along the northern boundary, surround the new building to the east of the existing sports hall building with a lawn, along with a path to gain access into the side of the sports hall to the north.

11. The application proposes to ensure all lighting is energy efficient with low energy bulbs, proposes a modern and highly efficient heating system as well as 38.4 square metres of south facing photovoltaic (PV) panels on the roof of the proposed extension to the east of the existing sports hall building.

12. The proposal would be providing on-site physical education needs and amenities for use by the school only, and does not propose to increase the school capacity, pupil intake or staffing numbers.

Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP - SE/22/645 (KCC/SE/0036/2022)

Site Location Plan



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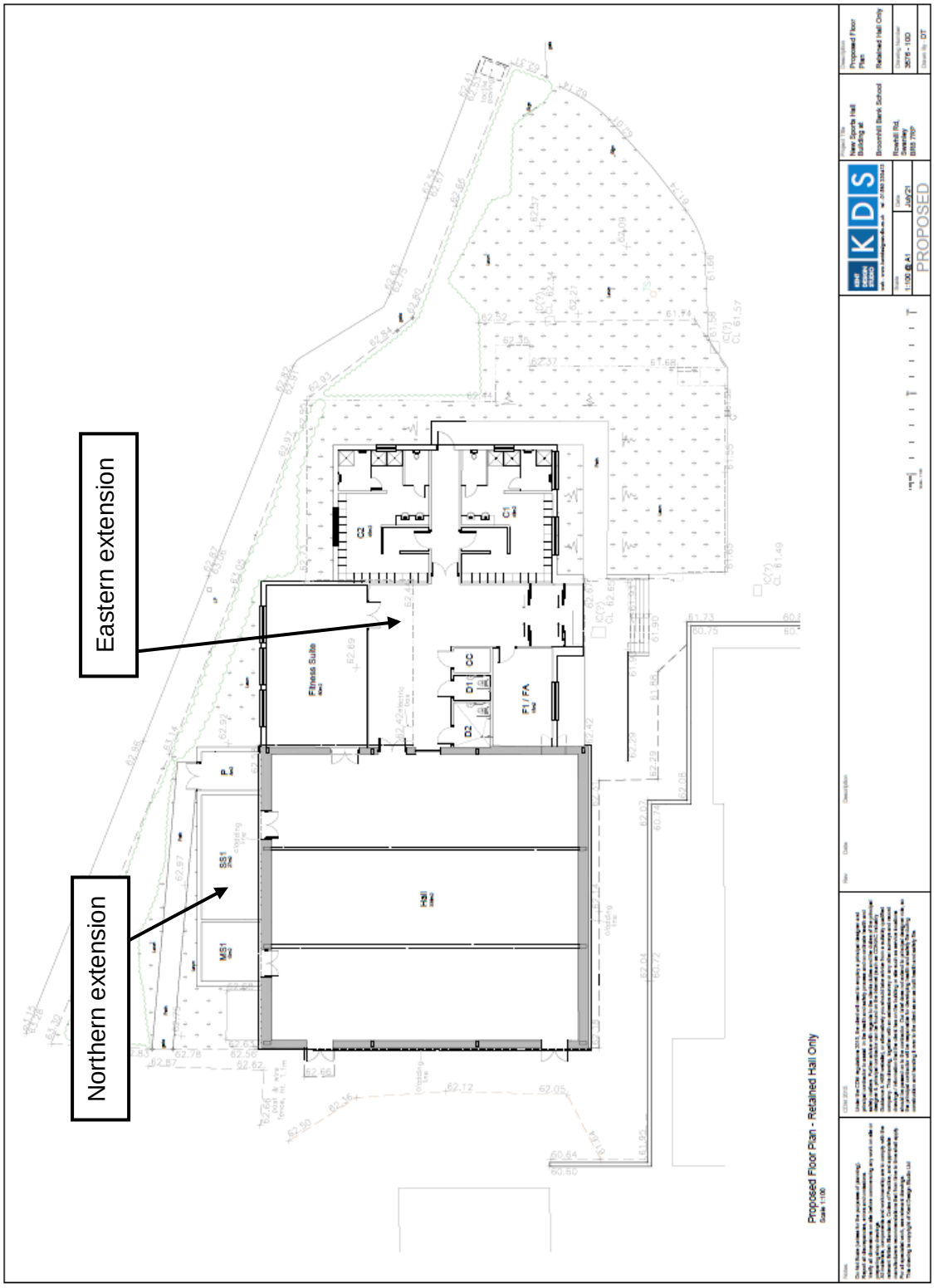
Previous Photos of the North of Site (showing the existing sports hall building to be retained and re-clad, as well as the swimming pool and ancillary buildings prior to any demolition works)




Photos of Partial Demolition Taken Place of the swimming pool and ancillary buildings to the east of existing sports hall (site visit 16 Mar 22)


Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP - SE/22/645 (KCC/SE/0036/2022)

Proposed Floor Plan



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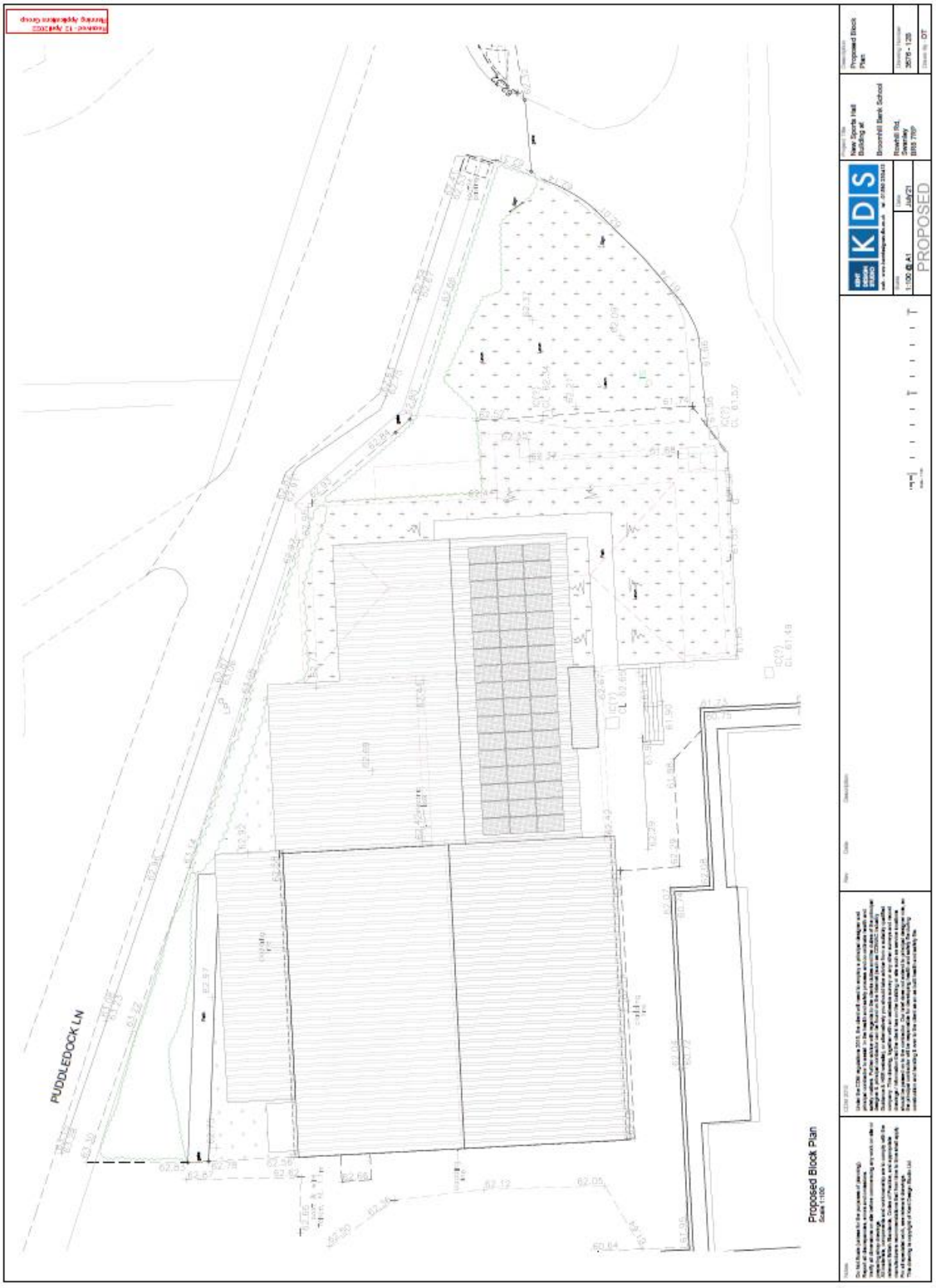
Proposed Block Plan



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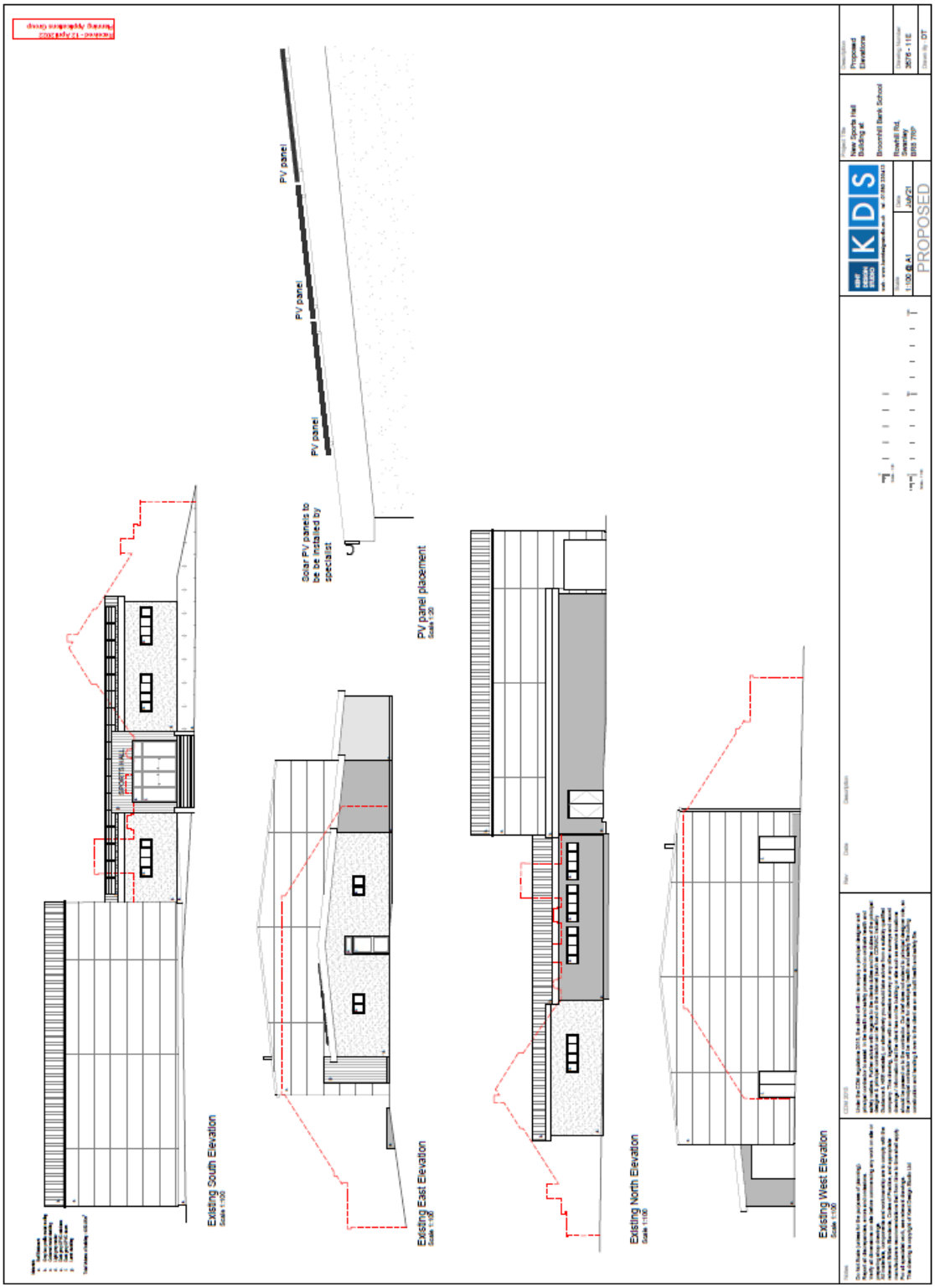
Proposed Elevations



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Planning Policy

13. The most relevant Government Guidance and Development Plan Policies summarised below are appropriate to the consideration of this application:

(i) The **National Planning Policy Framework (NPPF) July 2021** and the **National Planning Policy Guidance (first published in March 2014)**, sets out the Government's planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- That access to high quality open spaces and opportunities for sport and recreation are important in their contribution to health and well-being, and therefore that existing open space, sports and recreation facilities should not be built on unless the loss would be replaced by equivalent or better provision in terms of quantity and quality (paragraph 98,99);

- Consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people (paragraph 110);

- Consideration of whether impacts from the development on the transports network (in terms of capacity and congestion), or on highways safety, can be cost effectively mitigated to an acceptable degree (paragraph 110);

- Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe (paragraph 111);

- The creation of high quality, sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (paragraph 126);

- Achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Planning decisions should

ensure that developments would function well and add to the overall quality of an area; be visually attractive as a result of good architecture, layout and appropriate and effective landscaping; be sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place, creating a welcoming and distinctive place to live, work and visit; include an appropriate mix of development and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being (paragraph 130);

- Contributing to and enhancing the natural and local environment (paragraph 174);

In addition, Paragraph 95 states that: *It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools.*

(ii) **Policy Statement - Planning for Schools Development (August 2011)** sets out the Government's commitment to support the development of state-funded schools, and their delivery through the planning system. In particular, the Policy states that the Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity of provision in the state funded school sector, to meet both demographic needs, provide increased choice and create higher standards.

(iii) **Development Plan Policies**

The adopted **Sevenoaks District Core Strategy (February 2011)** (summarised policies)

Policy LO1	**Distribution of Development:** Requires all new development to be focused within the built confines of existing settlements.
Policy L07	**Development in Rural Settlements:** Requires all new development to be of a scale and nature appropriate to the village concerned and should respond to the distinctive local characteristics.
Policy SP1	**Design of New Development and Conservation:** Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and attractive environments, incorporate sustainable development principles and maintain biodiversity.
Policy SP2	**Sustainable Development:** Sets standards for sustainable design, construction and low energy generation. Proposals also cover measures to reduce the reliance on travel by car and seek to improve air quality.

Policy SP9 **Infrastructure Provision:** Supports the development of infrastructure facilities required to resolve existing deficiencies or to support the scale and distribution of development proposed.

Policy SP10 **Green Infrastructure, Open Space, Sport and Recreation Provision:** Promotes the provision of multifunctional green space by linking existing green space areas. The Policy also seeks the retention of open space, sports and recreational facilities, including indoor facilities of value to the local community, unless any loss can be justified by additional provision of at least equivalent value to the local community.

Policy SP11 **Biodiversity:** Seeks to conserve biodiversity, to ensure no net loss through development and to promote opportunities to enhance biodiversity.

The adopted **Sevenoaks Allocations and Development Management Plan (February 2015)** (summarised policies)

Policy SC1 **Presumption in Favour of Sustainable Development:** States that a positive approach should be taken in considering planning applications to reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework. The District Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.

Policy EN1 **Design Principles:** Sets out the need for high quality design and for proposals to meet criteria including: responding to scale, height and materials; respecting the topography and character of the site and any sensitive features; not result in the loss of buildings or open space that would affect the character of an area, provided satisfactory means of access and parking provision; include opportunities for increasing biodiversity potential, including sustainable drainage and to avoid harm to existing biodiversity; create a permeable layout; safe and easy access for those with disabilities; creation of a safe and secure environment to deter crime and fear of crime; include modern communication technology and infrastructure; and make efficient use of land.

Policy EN2 **Amenity Protection:** Proposals should provide adequate residential amenities for existing and future occupiers of development, and safeguard amenities of existing and future occupiers of nearby properties by ensuring development does not result in excessive noise, vibration, odour, activity, vehicle movements, overlooking or

visual intrusion and where it would not result in a loss of privacy or light.

Policy T1 **Mitigating Travel Impact:** Sets out the need to mitigate against adverse travel impacts including their impact on congestion and safety, environmental impact such as noise, pollution and impact on amenity and health.

Consultations

14. **Sevenoaks District Council:** Raise no objection to the application and recommend consideration is given to the imposition of conditions relating to details of all landscaping and boundary treatments including retained or additional landscaping, and details of ecological mitigation and enhancement strategies as set out within the Preliminary Ecological Appraisal dated September 2021.

Hextable Parish Council: Has made no comments on the application.

KCC Biodiversity Officer: Accepts that the submitted information is sufficient to determine the planning application and raises no objection subject to the imposition of several planning conditions;

The Biodiversity Officer sets out that the Preliminary Ecological Appraisal assessed that the buildings have limited potential to be used by roosting bats and whilst it would have been preferred that the report provided a more detailed description of the building to demonstrate why the conclusion was reached that bats are unlikely to roosting, they are satisfied that based on the limited information and photos submitted it is accepted that the conclusions are valid and additional information is not required. It is likely that bats forage/commute within the site and therefore it is recommended that any lighting condition require the lighting plan to follow the recommendations within the Bats and artificial lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals.

It is also advised that although evidence of breeding birds was not recorded during the survey, there are suitable features within the site for breeding birds. All breeding birds and their young are protected under the Wildlife and Countryside Act 1981 (as amended) and it is therefore advised that a breeding bird informative is included, should planning permission be granted.

The Biodiversity Officer also outlines that the habitat within the site is not optimum for reptiles however there is connectivity to the surrounding area and therefore, if suitable features for reptiles are created on site, it is possible that reptiles may establish. The Construction Management Plan has confirmed that the precautionary mitigation detailed within the ecological report would be implemented during the works.

Lastly, the Preliminary Ecological Appraisal has made recommendations to enhance the site for biodiversity, but no information has been provided demonstrating what enhancements will be incorporated into the site. Therefore, should planning permission

be granted, it is recommended that an ecological enhancement condition is included seeking its submission for approval.

KCC Highways and Transportation: Raise no objection to the application subject to the imposition of a condition requiring adherence to the submitted Construction Management Plan.

KCC Highways and Transportation initially commented that the site would utilise an existing access, would not result in any change to the existing parking provision and the proposal would not result in an increase in pupil intake, and therefore raised no objection subject to the submission of a Construction Management Plan prior to the commencement of any development on site. It was advised that the Construction Management Plan must include routing of construction and delivery vehicles to and from the site, parking and turning areas for construction, delivery vehicles and site personnel, timings of deliveries, provision of wheel washing facilities and temporary traffic management/signage.

The Applicant subsequently submitted a Construction Management Plan and KCC Highways and Transportation commented that it is noted that a Construction Management Plan has now been included within the planning application and is acceptable from a highways perspective. It was confirmed that providing the adherence to the submitted Construction Management Plan is secured by planning condition, no objection is raised.

Sustainable Drainage: Raise no objection to the proposal.

Local Member

15. The local County Council Member for Swanley, Mr Perry Cole, was notified of the application on 8 March 2022, and raised concerns surrounding the lack of sustainability elements included within the proposal, and potential impacts on the already constrained local highway network from construction traffic during peak times in particular.

    Mr Cole outlined that he was “rather disappointed to see that with this opportunity, no alternative energy sources have been explored. For example, the sports hall, that is to be retained and ‘re-clad’ has a large south facing shallow pitched roof that would lend itself one would have thought, perfectly for EV panels? As KCC are spearheading our 2030 carbon neutral target and advocating the benefit of ‘Solar Together’ then is this a missed opportunity? Low power lights or bulbs (as per Access and Design statement) is a small step toward reducing a carbon/energy use footprint but so much more can be done retrospectively – and with this sort of project, the scaffolding etc will already be in place for the cladding work to be undertaken.”

    Mr Cole also raised concerns regarding highways and access implications, stating that a “methodology statement is missing from the application. I thought that logistical issues would have been identified and addressed within the Design and Access Statement, but were not. I was disappointed to read simply that access is via Rowhill Road to the West and Puddledock Lane, to the North. This area, comprising Rowhill Road, St David’s

Road and Puddledock Lane causes many traffic problems – especially at school opening and closing times – with Hextable Primary School being literally across Rowhill Road from the entrance to Broomhill Bank School. I have managed to secure 'Road not suitable for HGV' signs to be installed at the junction of Puddledock Lane and St David's Road where they meet Top Dartford Road. My predecessor argued for the inclusion of these signs for some years without success but since my election in May '21 and having provided photographic evidence of the problems encountered with HGV's and general traffic on this stretch of road, it was agreed that although the signs are not enforceable, there was justification for their installation due to the number of inappropriate vehicles using this 'cut-through' route. I am currently working with Hextable Primary School in establishing a School Transport Plan to assist with morning and afternoon traffic problems/chaos/pupil and pedestrian safety concerns and also with KCC Schools Transport Officer Iona Rogulski to look at how this area can be improved. I have spoken with my Highways Schemes officer to look at how the traffic priorities might be changed to assist with traffic flow and pedestrian safety in the immediate area. You will see from mapping software that Puddledock Lane is very narrow in places (single track – and I use the word 'track' deliberately) with little or no pavement, and although the site of the sports hall sits to the East of the main problem area, many parents and pupils use Puddledock Lane to arrive at or depart from Hextable School on foot or by car. Similarly, a large number of parents and pupils use Rowhill Road and although Hextable Primary have recently acquired a parcel of land adjacent to Broomhill Bank School for off-street parking this acts both as a magnet for those seeking to park as well as increasing the traffic flow in that road – especially at school closing time. I would very much like to see proposals from the applicant as to how they intend to mitigate any disruption in this area caused by their intended proposals with regard to the arrival and departure of both contractors and deliveries; the size of the vehicles intended to be utilised for deliveries and the steps that will be taken to ensure that pedestrian and pupil safety will not be compromised by the temporary increase in both private vehicle and larger MGV or HGV traffic. I hope that any works could be undertaken during school holidays when the surge for demand at peak times (08:00 – 09:15 and 14:30-15:30hrs) will simply not exist."

16. Following the comments made by Mr Cole, the applicant submitted a Construction Management Plan which KCC Highways and Transportation have confirmed is acceptable from a highways perspective, as well as a 'Low Zero Carbon Technology Report' and a 'Compliance Report' which proposed 38.4 square metres of south facing photovoltaic panels. Mr Cole was notified of this and confirmed on 25 April 2022 that he had nothing further to add in relation to the update.

Publicity

17. The application was publicised on the 16th March 2022 by the posting 3 site notices.

Representations

18. In response to the publicity, 7 letters have been received objecting to the application. The key points can be summarised as follows:

Access, Parking and Highways

- Puddledock Lane is a narrow single track lane which cannot cope with the volume of traffic/vehicles and already gets congested by parked cars during school drop off and pick up times.
- Frequent obstructive parking along Puddledock Lane during drop off and pick up times, presents a road safety danger to pedestrians, including school children walking to and from Broomhill Bank School, Hextable Primary School as well as visitors to the nearby Emerson Grange Care Home.
- Frequent parking on private neighbouring driveways and property entrances along Puddledock Lane when the road is blocked up during drop off and pick up times.
- Existing congestion prevents unhindered access to residents of Puddledock Lane, Rowhill Road and St David's Road and restricts emergency vehicle access.
- Suggest that obstructive parking of Broomhill Bank School traffic in the public highway is conditioned and suggest KCC Highways revisit the school and look at school pick up times to see existing issues.
- Question why the access gate to the north of the school site on Puddledock Lane is kept closed, and doesn't allow the vehicles causing obstructions to park on the school site. This gate being kept closed is the main cause of the ongoing chaos and congestion problems on Puddledock Lane with traffic building around peak times. Suggest that the north access gate on Puddledock Lane is opened to prevent ongoing congestion issues.
- Question why the main school gates to the west of the site on Rowhill Road is not being utilised, which is located on a wider and safer road more suitable for school vehicle access.
- Question if the development would be open to the general public, and if so where they would park. Suggest that the non-public use of the proposed buildings, both now and in the future, are secured via planning condition.

Local and Residential Amenity

- Noise from the school is already and has been an ongoing problem, with the new facilities creating more noise.
- Potential noise and music nuisance from the sports hall and proposed fitness suite causing disturbance to neighbouring residential properties.
- Suggest a planning condition to control noise.

Design

- Proposal is not in keeping with the character of the surrounding buildings .

Discussion

19. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 13 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 70(2) of

the Town and Country Planning Act 1990 provides that the local planning authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. The proposal therefore needs to be considered in the context of the Development Plan Policies, Government Guidance, local finance considerations (where applicable) and other material planning considerations arising from consultation and publicity.

20. This application is being reported for determination by the Planning Applications Committee due to the objections received from local residents, as set out in paragraph 18 above. In my opinion, the key material planning considerations in this particular case are the principle of development and the need for education facilities; the siting and design of the development; the sustainability measures proposed; any highway and transportation implications linked to the proposal; landscape, tree and ecological matters and potential impact on residential and local amenity.

Need for the development

21. Planning policy guidance in the form of both the NPPF and the Policy Statement for School Development are strongly worded to ensure that proposals for the development of state funded schools should, wherever possible, be supported. In summary, the guidance states that there should be a presumption in favour of the development of state funded schools; that planning authorities should take a proactive, positive and collaborative approach to meeting this requirement; and that any refusal would have to be clearly justified. The school site lies within the defined built-up area of Hextable and as such the principle of development is accepted, subject to it being in accordance with other relevant policies.

22. Broomhill Bank School is a Special Educational Needs (SEN) school for students who have an Educational Health Care Plan (EHCP) reflecting their primary special educational needs and disabilities (SEND) as autism with other co-conditions such as speech and language difficulties and attention deficit hyperactive disorder (ADHD). The school's curriculum is designed to support the students and offers a wide range of subjects providing an academically similar experience to mainstream secondary, within a suitable learning environment. The application documentation sets out that Broomhill Bank School currently suffers from a lack of internal space to deliver a kinaesthetic (personal awareness and movement) curriculum, therapeutic interventions and sports facilities for its existing students. To fulfil the requirements of the students EHCP, many students require occupational therapy interventions or benefit from sensory circuits delivered each morning. The application details that the current lack of internal sports facilities and space has a detrimental impact on the students, limiting effective year round learning and training facilities for teaching sports, and restricts students with a SEN diagnosis the full opportunity to study GCSE and A Level PE to the same standard as students would in a main stream school.

23. The existing sports hall building, located at the north of the school site, is currently in a poor state of disrepair requiring considerable improvement to provide adequate sports facilities for the school. The swimming pool has been closed off with entry prohibited since the handover of the school site from The Furness School to Broomhill Bank School

in 2015, and following the identification of a large amount of asbestos combined with instability of the roof, the swimming pool building, and ancillary building have been partially demolished due to health and safety concerns. It is therefore proposed as part of this planning application to refurbish the existing sports hall building, complete the demolition works of the swimming pool and ancillary building, and provide a dedicated sports and changing room facilities extension predominantly on the extent of the existing hardstanding/building area.

24. The development would provide a lobby area, a fitness suite, two changing rooms, a separate facility room and associated lobby/entrance, toilets to the east and storage/sports rooms to the north of the existing sports hall. It is considered that the development would provide much needed internal sports facilities to support all year round needs of PE, and provide a dedicated internal space to support and enable therapeutic interventions and kinaesthetic learning through physical activity.

25. Therefore, in my view, there is a strong case for the replacement and improvement of the sports facilities at the school. The development would largely constitute a replacement of the existing facilities/built development on site already within an established educational complex, and I consider that the educational need for the proposed development should be given significant weight in this instance. The site has an established educational use, and the provision of such new facilities would be considered acceptable in principle in respect of the policy and guidance in the NPPF and Planning Policy Statement for Schools Development, subject to other policy considerations which are addressed below. In considering the above, I accept the need for the proposed development.

Siting and Design

26. The planning application proposes to retain the existing sports hall building and re-clad it with a profiled panel system in a grey finish. The application also proposes the demolition of the existing swimming pool building and ancillary building, and the erection of a single storey replacement building, partly to the north of the existing sports hall building, and partly to the east. The area of development would be situated at the north of the school site, within the existing confines of the school premises and on an area of existing development within the school site. The proposed single storey extension to the east of the existing sports hall building would largely constitute a replacement of the existing facilities on site already, and would be situated on the extent of the existing hardstanding and building development area. The proposed single storey extension to the north of the existing sports hall building would extend slightly further towards the northern school boundary (approximately 4 metres). Vegetation between the existing sports hall and northern boundary is proposed to be retained. As shown on the submitted plans, the proposed replacement building works are considered to be subservient in size to the existing sports hall building, and it is not proposed to create any development significantly larger than the existing development currently on site. Considering the matters above, I am satisfied that the proposed location of the single storey extensions are considered appropriate within the school site.

27. The application also seeks to improve and enhance the existing and poor external appearance and physical state of the existing sports hall building through re-cladding

with a profiled panel system in a grey finish. The agent has stated that the re-cladding would result in a modern, contemporary design that is fit for purpose and responds well to the wider improvement and refurbishment works, and considers that it would improve the existing external appearance.

28. The application proposes that the replacement single storey extensions situated north and east of the sports hall building would be finished in brickwork to match the existing school buildings, along with grey render. The extension to the east of the sports hall building is also proposed to include vertical natural timber cladding to the front entrance, along with grey aluminium doors and windows, and a metal profiled sheet roof. The application proposes a range and mix of materials that would be reflective of its purpose and function within the school setting, whilst maintaining a simple pallette to reflect its functional and educational nature and would be consistent with other related development at the school site. It is also stated that the proposed development would integrate with the existing school complex and have minimal impact on the surrounding environment, as well as preserve the character and appearance of the locality. Similarly, it is considered that, as a result of the proposed development, the overall mass and scale of the redeveloped buildings would be reduced compared with the previous group of buildings prior to demolition.

29. In this instance, I consider that the visual appearance of the existing sports hall building, and the swimming pool and ancillary buildings (as they were and now partially demolished) would be significantly improved by the development proposed. I consider that the site currently detracts from the school site and street scene, with the existing sports hall building in need of refurbishment and repair to improve its external visual appearance, and the single storey extensions would replace the partially demolished building works currently on site. I consider that the re-cladding of the existing sports hall building would provide a fresh and clean external appearance, that would be appropriate in this location and that the proposed single storey extensions would not create any development significantly larger or more significant than that was on site previously. Whilst the northern extension of sports hall building would create development slightly further north within the school site, the northern boundary hedgerows and landscaping are to be retained, and this element being single storey would be minimal in relation to the existing sports hall building. Similarly, the single storey extension to the east of the existing sports hall building would be predominantly within the previous footprint (in terms of hard standing and built development) of the partially demolished swimming pool building and ancillary building, and is it not considered that this would create any more significant development than on site previously.

30. I am satisfied that the development would result in improved external design and appearance, which would be acceptable in visual terms and consider that this would result in visual betterment. I am satisfied that the proposed materials are appropriate in principle given the location within the existing school site, and would be in keeping with the surrounding built development. However ,I recommend that final details be required pursuant to planning condition, should permission be granted. Further, the development would also be screened to the north to an acceptable extent by the existing hedgerows and vegetation that are to be retained. The proposal would therefore accord with the NPPF objectives on design, Sevenoaks District Core Strategy (February 2011) Policy

SP1: Design of New Development and Conservation, and Sevenoaks Allocations and Development Management Plan (February 2015) Policy EN1: Design Principles.

Sustainability

31. The application proposes that the single storey extensions, both to the north and east of the existing sports hall building, would be fitted with energy efficient low energy light bulbs, and include a modern highly efficient heating system. Furthermore, the application is supported by a 'Low Zero Carbon Technology Report' and 'L2A Compliance Report' which was submitted following the comments made by the Local Member Perry Cole. The documents detail the anticipated energy use and carbon dioxide (CO2) emissions, heating and power requirements, low carbon design approach, and set out that the 10% target of on-site energy generation would be achieved by the inclusion of a photovoltaic (PV) array of 24 panels totalling 38.4 square metres on the south facing roof of the extension to the east of the existing sports hall building. The agent has confirmed the inclusion of 38.4 square metres of PV panels and the drawings, including roof plan, now reflect this as part of the proposal. In relation to ventilation, the Compliance Report details proposed heating, cooling and ventilation systems, and sets out that natural ventilation by operable windows would be provided to all areas, as well as extract ventilation which would be provided with fans local to the space served.

32. Based on the information set out above, I am satisfied that the proposal would accord with the NPPF objectives on the presumption in favour of sustainable development, Sevenoaks District Core Strategy (February 2011) Policy SP2: Sustainable Development, and Sevenoaks Allocations and Development Management Plan (February 2015) Policy SC1: Presumption in Favour of Sustainable Development.

Access, Parking and Highways

33. During the consultation period, concerns were raised by Local Member, regarding the lack of information provided on how the combined impact on the local highways network would be mitigated. In particular, how it would be intended to mitigate any disruption to the local area with regards to the arrival and departure of both contractors and deliveries, the size of vehicles intended to be utilised for deliveries, and the steps that would be taken to ensure that pedestrian and pupil safety would not be compromised by the temporary increase in both private vehicles and larger vehicle traffic. Mr Cole also outlined that the local area, comprising Rowhill Road, St David's Road and Puddledock Lane, currently suffers many traffic and congestion issues, particularly during peak drop off and pick up times due to combined pressures from both Broomhill Bank School (north) and the adjacent Hextable Primary School.

34. Similarly, objection has been received from local residents on the grounds of existing ongoing congestion on the local highway network, in particular, Puddledock Lane to the north of the school site. The representations outline that the narrow single track nature of Puddledock Lane mean that it is unable to cope with the existing volume of traffic and parking, and has led to excessive congestion, obstructive parking, causing significant pedestrian safety concerns and restricting emergency access. The objections also outline that one of the main causes of the ongoing congestion is that the school gate at

the northern access on Puddledock Lane is kept closed, therefore not enabling the vehicles causing obstructions in to the school site to park safely. The combination of school time traffic from Broomhill Bank School (north), Hextable Primary School and occupiers and visitors of Emerson Grange Care Home all contribute to the ongoing existing local congestion issues.

35. Broomhill Bank School (north) is accessed via Rowhill Road to the west of the school site, and also includes a secondary access via Puddledock Lane to the north. The application seeks to provide on-site physical education needs and amenities for use by the school only, and proposes to utilise existing on-site parking provision and access. The application does not propose to increase the school capacity, pupil intake or staffing numbers and therefore there would be no material increase in traffic generation as a result of the proposed development. The facilities will not be available for use by the general public.

36. Should planning permission be granted, there would however be a marginal increase in traffic for a limited temporary period, throughout the duration of the construction of the development. Following the concerns raised by both Local County Member and local residents, a Construction Management Plan (CMP) was submitted. The CMP sets out the likely operations that would be involved as part of any construction activities and aims to ensure a safe and environmentally responsible method of construction. In particular, the document details the proposed hours of working and sets out that heavy commercial vehicles engaged in either the import or export of construction material or waste would not be permitted to enter or leave the site outside the hours of 9.30-14.00 Monday to Friday (excluding bank holidays) to minimise the potential impact of construction activities on the surrounding road network. Access to and from the site for all vehicle types is strongly encouraged to approach and exit via the eastern end of Puddledock Lane, and it is intended that deliveries would be staggered to ensure that there is no congestion at or near to the site. Highways and Transportation are satisfied that the site would utilise an existing access, would not result in any change to the existing parking, that the proposal would not result in an increase in pupil numbers and therefore raise no objection. They have also confirmed that the submitted Construction Management Plan is acceptable and should planning permission be granted, request a condition seeking the adherence to the submitted Construction Management Plan. In light of the highways and Transportation advice and the details within the submitted Construction Management Plan I am satisfied that local objections raised would be addressed by the controls set out in the CMP.

37. It is noted that those objecting to the application, question why the access gate to the north off Puddledock Lane is kept closed and does not enable the flow of vehicles into and out of the school site, especially during peak drop-off and pick-up times. As the planning application seeks to provide replacement on-site physical education amenities for use solely by the school and does not propose to increase school capacity or pupil numbers meaning there would not be any increase in long term vehicle movements, the opening of the northern access gate is not within the scope of the determination of this planning application. This matter is considered a school management issue to be taken up with the school directly. The Agent has confirmed that the school is reviewing more comprehensively the way in which it operates the parking and pick-up/drop-off

arrangements, and the school would be willing to meet with local residents and discuss their concerns regarding current parking arrangements and the gate.

38. The local residents who raised objection were written to advising them of the matters detailed above, however maintain their objection.

39. Highways and Transportation have raised no objection to the application and confirmed that the submitted Construction Management Plan is acceptable and should planning permission be granted, require a condition seeking adherence to the submitted Construction Management Plan. The planning application would have no direct long term implications on traffic generation and vehicle numbers to and from the site, and increased vehicle movement during construction would be for a temporary period. The proposal is in general conformity to Sevenoaks Allocations and Development Management Plan (February 2015) Policy T1: Mitigating Travel Impact. It is therefore considered that the application does not pose unacceptable impacts on parking and traffic implications upon the local highway network and complies with planning policy and guidance.

Residential and local amenity

40. As set out above, the proposed development would be sited at the north of the existing school site, adjacent to Puddledock Lane, and seeks to retain and re-clad the existing sports hall building, complete demolition of the existing swimming pool building and ancillary building, and erect a single storey replacement building partly to the north and partly to the east of the existing sports hall building. The building to the east of the existing sports hall building would largely constitute a replacement of the existing facilities on site and would be situated within the existing built confines of the school site. The single storey building to the north of the existing sports hall building would extend slightly further towards the northern school boundary. The existing vegetation along the northern boundary of the school site is proposed to be retained and would continue to provide significant screening to the nearest residential properties which are located to the north along Puddledock Lane. The façade of the nearest residential property is approximately 35 metres from the proposed northern extension. It should also be noted that the boundaries of the residential properties along Puddledock Lane benefit from existing hedging between the houses and road, and the houses are set back from the road.

41. Objection has been received from local residents on the grounds of potential noise and music nuisance from the sports hall and new fitness suite causing disturbance and noise to neighbouring residential properties. The Agent has confirmed that it is unlikely any significant noise or nuisance would be created from the use of the development as part of the scheme relates to the re-cladding of the existing sports hall building, which would be used for its existing purpose and use. Moreover, it is stated that the erection of the single storey replacement sports and changing room facilities would essentially substitute the existing (partially demolished) swimming pool building and ancillary building. The agent has confirmed that the buildings would be for use by the school only and this would be secured via planning condition, should permission be granted. Therefore, it is considered that there would be no net change in the use of the land and

buildings. Similarly, the proposal is not providing for additional capacity, nor is it seeking to offer any music facility. The Agent states that the existing situation would remain, in terms of the use and facilities on the school site.

42. In relation to local and residential amenity, I note that Sevenoaks District Council has raised no objection on these ground in its response, and I consider that the development would not cause significant harm to local and residential amenity, and as such would not be in conflict with Policy EN2 Amenity Protection of the Sevenoaks Allocations and Development Management Plan (February 2015) in this regard.

Ecological Enhancements and Landscaping

43. The application was supported by the submission of a Preliminary Ecological Appraisal which has been considered by the County Council's Biodiversity Officer. The findings of the Appraisal show that the buildings have limited potential to be used by roosting bats and breeding birds, and recommend that ecological enhancements should, where possible, be included in the proposed development plans to contribute towards the objectives of the NPPF.

44. The Biodiversity Officer notes that the Preliminary Ecological Appraisal has made recommendations to enhance the site for biodiversity, but no information has been provided demonstrating what enhancement would be incorporated into the site. Therefore it is recommended that, should planning permission be granted, a condition should be imposed to secure details of ecological enhancement features to be incorporated into the site. With regard to external lighting, the Biodiversity Officer notes that external lighting can have a negative impact on roosting bats and therefore recommend that any lighting condition requires the lighting plan to follow the recommendations of the 'Bats and Artificial Lighting in the UK' document. The Biodiversity Officer also states that an informative should be imposed on any permission given to ensure the protection of breeding birds which are protected under the Wildlife and Countryside Act 1981 (as amended). Finally, the Construction Management Plan has confirmed that the precautionary mitigation detailed within the ecological report would be implemented during works and therefore raise no objection subject to the imposition of the conditions and informative mentioned above.

45. Sevenoaks District Council raise no objection and recommend that consideration is given to the imposition of conditions relating to details of all landscaping and boundary treatments including retained or additional landscaping, and details of ecological mitigation and enhancement strategies as set out within the Preliminary Ecological Appraisal dated September 2021, March Environmental Ecological Consultants. The Agent has confirmed that the hedgerow along the northern boundary of the site, adjacent to Puddledock Lane, is to be retained. To ensure that the existing landscaping is not adversely affected by the development, details of a scheme of landscaping, replacement trees and tree protection would be secured via condition should planning permission be granted.

46. Subject to the imposition of the conditions and informative mentioned above, it is considered that the application is acceptable on ecological grounds and would accord

with Policy SP11 Biodiversity of the Sevenoaks District Core Strategy (February 2011). I am also satisfied that the requirements set out in the NPPF in terms of enhancing and protecting biodiversity. The proposal is also considered acceptable in landscaping terms.

Conclusion

47. This planning application seeks to provide physical education facilities to offer year round dedicated spaces for sports activity and suitable facilities to assist in the deliverability of students Educational Health Care Plans (EHCP) at Broomhill Bank (north) Special Educational Needs (SEN) School. The proposal seeks the retention and re-cladding of the existing sports hall building, demolition of the swimming pool building and ancillary building, and the erection of a single storey replacement sports and changing room extension at Broomhill Bank School (north). It is proposed that the replacement building elements would serve as an extension to the existing sports hall building and would be situated partly to the rear of the existing sports hall building to the north, and partly to the east. The proposal largely constitutes a replacement of the existing facilities/built development on site already, predominantly located within the existing hard standing of the swimming pool building and ancillary building that would be demolished. The reclad sports hall and replacement buildings would comprise a lobby area, a fitness suite, two changing rooms, a separate facility room and associated lobby/entrance, toilets and storage/sports rooms.

48. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF. It accords with the Planning Policy Statement - Planning for School Development which gives great weight to the development of state-funded schools, their delivery through the planning system and the adaptation and improvement of facilities Subject to the conditions and informatives below, I do not consider that the development would result in any significant adverse impact in respect of siting and design, residential and local amenity, landscaping and ecology, or parking and traffic implications upon the local highway network.

49. In my view the development is sustainable and I recommend that planning permission be granted subject to the conditions set out below.

Recommendation

50. I RECOMMEND that PERMISSION BE GRANTED SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

    1. The standard three year time limit;
    2. The development to be carried out in accordance with the permitted details;
    3. Within 3 months of the date of the decision, details of the external materials, including colour finishes, in accordance with those set out within the application shall be submitted for the approval of the County Planning Authority, and the development shall thereafter be carried out using the approved external materials;

4. The use of the development hereby permitted shall be for school use and purposes only and shall not be made available for use by the general public;
5. The measures set out in the Construction Management Strategy dated June 2022 shall be strictly adhered to for the duration of construction operations;
6. Within 3 months of the date of this decision, details of a scheme of landscaping shall be submitted for the written approval of the County Planning Authority, and such scheme shall detail all landscaping and boundary treatments including retained or additional landscaping, and shall thereafter be implemented as approved within the first planting season following completion of the works;
7. In the event of any trees, shrubs and hedges included in the landscaping scheme, approved pursuant to condition (6) above, or any replacement trees, shrubs or hedges being removed, destroyed or dying or dead within 5 years of the planting, they shall be replaced within 12 months in the same places by large nursery stock of the same species;
8. The development hereby permitted shall be carried out in such a manner as to avoid damage to any existing trees/hedges, including their root system, to be retained as part of the landscaping scheme by providing/installing tree protection;
9. Within 3 months of works commencing within the site, an ecological enhancement plan shall be submitted for the approval of the County Planning Authority, and must demonstrate how the site will be enhanced to benefit biodiversity and thereafter be implemented as approved;
10. Within 3 months of date of this decision, details of any new additional external lighting and hours of lighting operation, including the lighting of access areas, and lighting on the buildings hereby permitted, shall be submitted for the written approval of the County Planning Authority, and thereafter be implemented as approved. The external lighting scheme must adhere to the Bat Conservation Trust's 'Bats and Artificial Lighting in the UK' guidance;

51. I FURTHER RECOMMEND that the following INFORMATIVES be added:

1. Advice that planning permission does not convey any approval to carry out work on or affecting a public highway and that engagement with KCC Highways and Transportation would be required at an early stage.
2. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees, scrub, hedgerows and buildings are likely to contain nesting birds between 1st March and 31st August inclusive. Buildings and vegetation are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

Case Officer: Chloe Palmer	Tel. no: 03000 415718
Background Documents: see section heading	

Item D2

Proposed 2 FE expansion, involving the erection of a new freestanding 2-storey school building, new staff car park, new parent car park and drop off/pick up area, with associated access, signage and landscaping works at Meopham School, Wrotham Road, Meopham, Kent, DA13 0AH – GR/22/110 (KCC/GR/0014/2022)

A report by Head of Planning Applications Group to Planning Applications Committee on 20 July 2022.

Application by Kent County Council Infrastructure Division for a proposed 2FE expansion, involving the erection of a 2-storey free standing building, new staff and parent car park and drop off/pick up area, with associated access, signage, and landscaping – Meopham School, Wrotham Road, Meopham, DA13 0AH (Ref: KCC/GR/0014/2022 and GR/22/110).

Recommendation: The application be referred to the Secretary of State for Levelling Up, Housing and Communities as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that SUBJECT TO his decision, and completion of a Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan and Public Transport Capacity Improvements planning permission to be granted, subject to conditions.

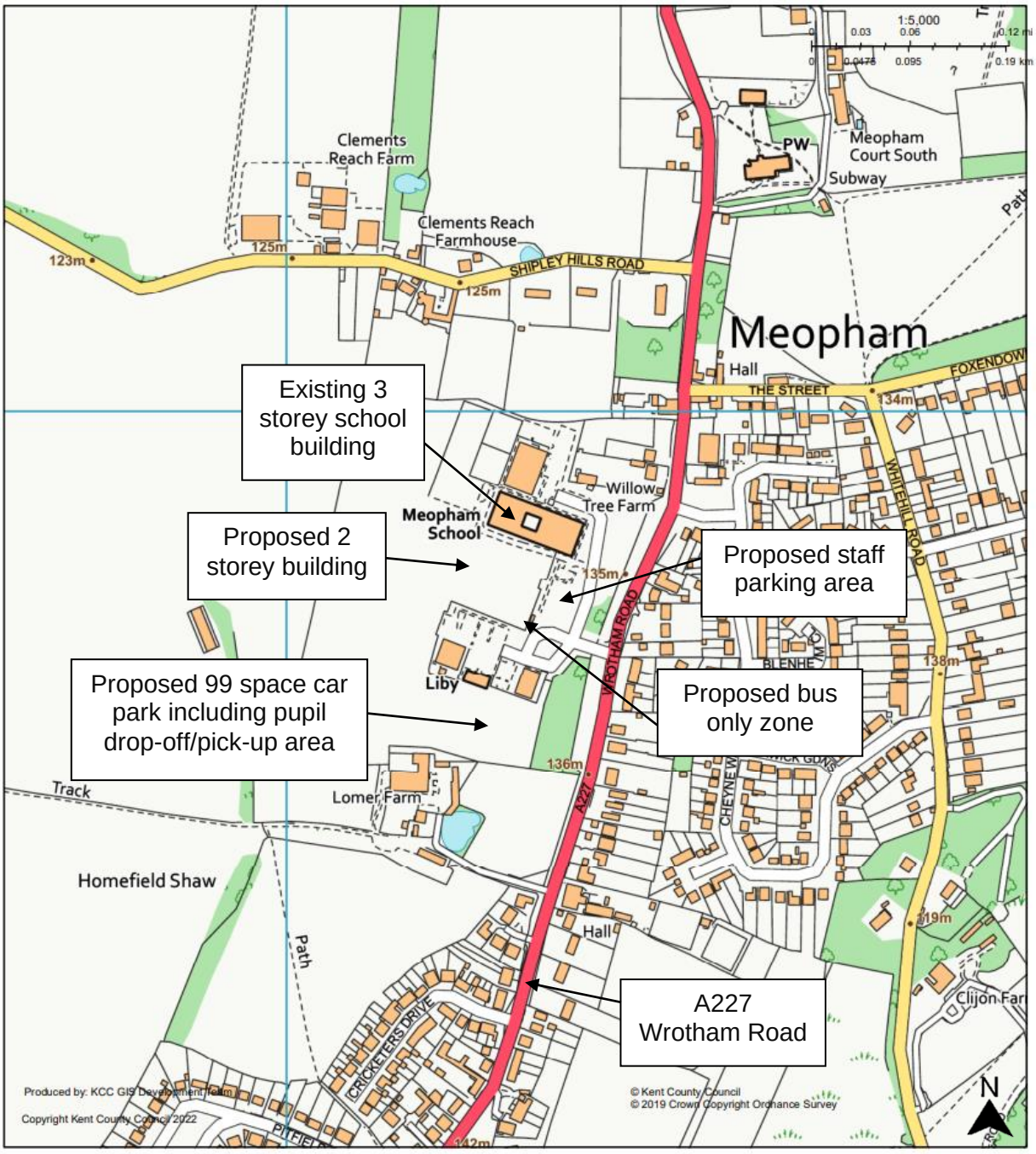
Local Member: Mr B Sweetland **Classification:** Unrestricted

Site

1. The application site is located within the existing Meopham School site. The School is located on the west side of Wrotham Road (A227) in Meopham, which is a village approximately 5 miles south of Gravesend. The A227 is the main road running north-south through the village and connects with the A2 to the north and the M20 to the south. The school site lies adjacent to the settlement of Meopham Green. The school occupies a regular parcel of land of approximately 9.6 hectares. Meopham School is set back from Wrotham Road and separated by a green landscaped buffer area. The built-up part of the site is comprised of a 3-storey building orientated in a north west to north east direction and located to the north side of the sites only vehicular and pedestrian entrance. Behind the school building and located to the west are the school's playing fields. To the north of the existing 3-storey building is the Meopham Fitness and Tennis Centre and to the south of the school building is Meopham Medical Centre, Meopham Library, and the Busy Bees Nursery. The Meopham School entrance from Wrotham Road is shared with these neighbouring users. To the east of the school site and on the opposite side of Wrotham Road is residential development. The School site is immediately surrounded to the west by agricultural land, to the north by the rear gardens of properties along Shipley Hills Road, and to the south by a working Farm. Further afield the site is surrounded by residential development to the south and east and agricultural land to the north and west. Dense hedgerows surrounding the perimeter of the site conceals much of the visual impact of the school buildings from the nearby residential areas and farmland. Please refer to the Site Location Plan.

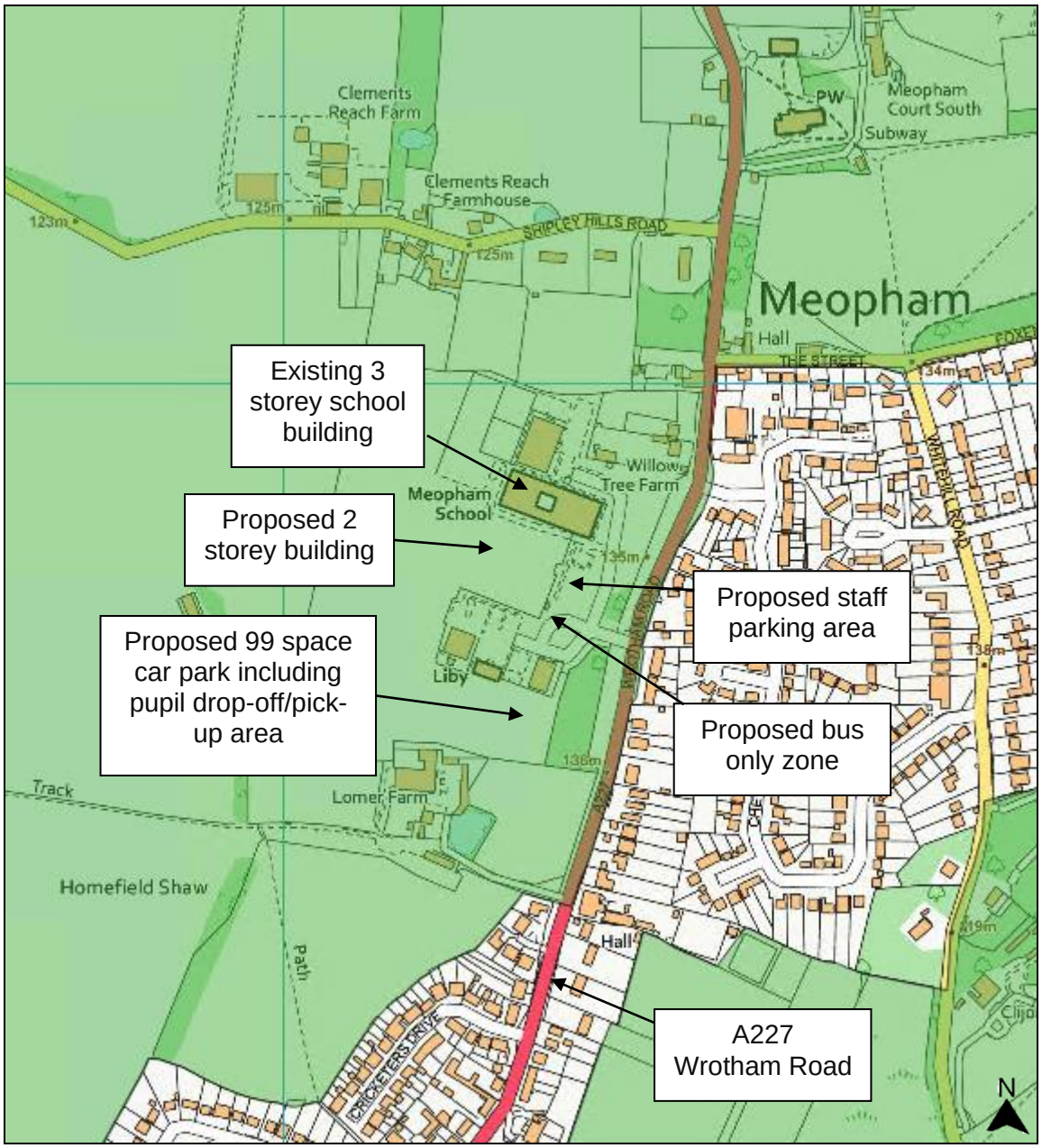
Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

Site Location Plan



Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

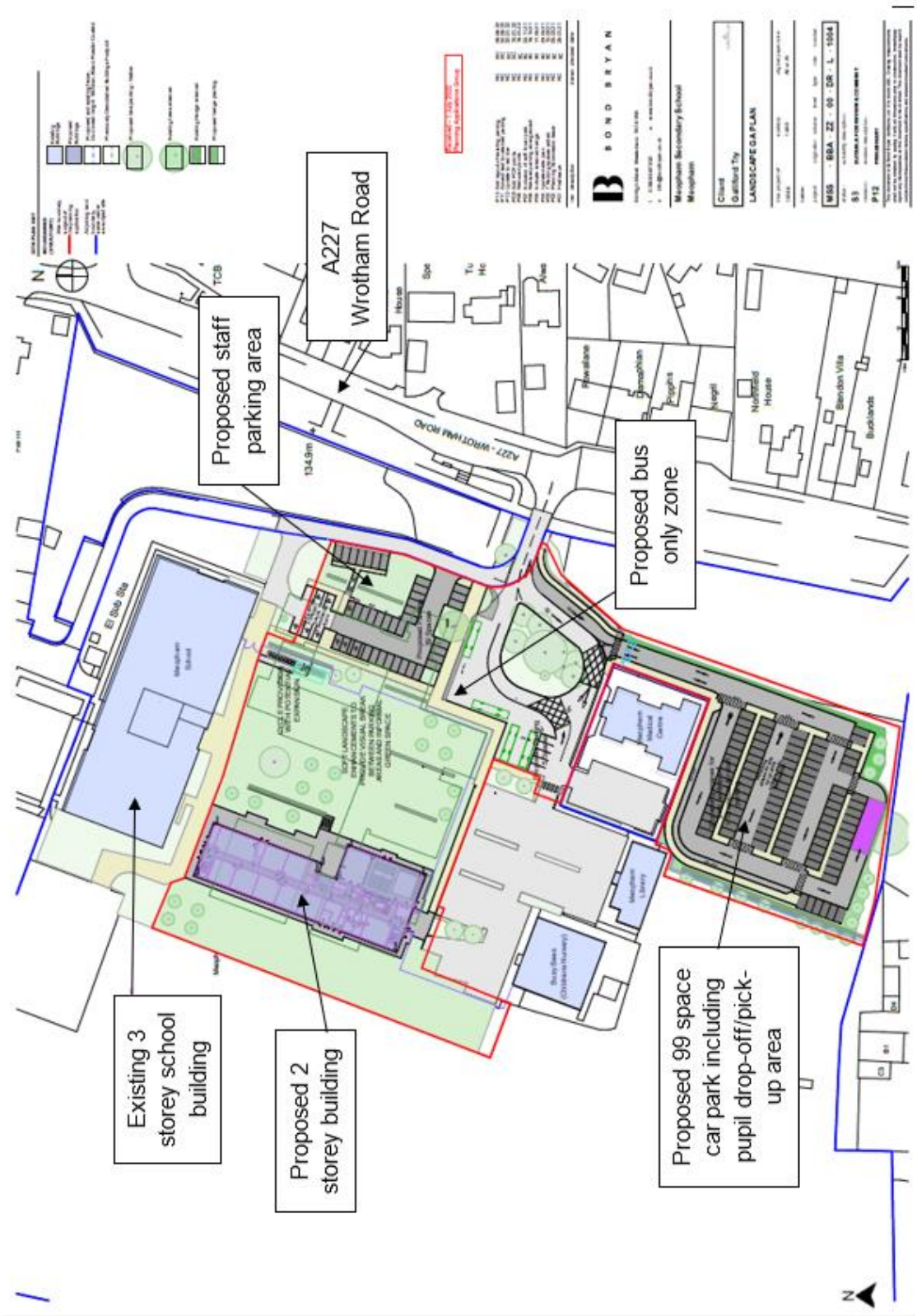
Site Location Plan with Greenbelt



Greenbelt

Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

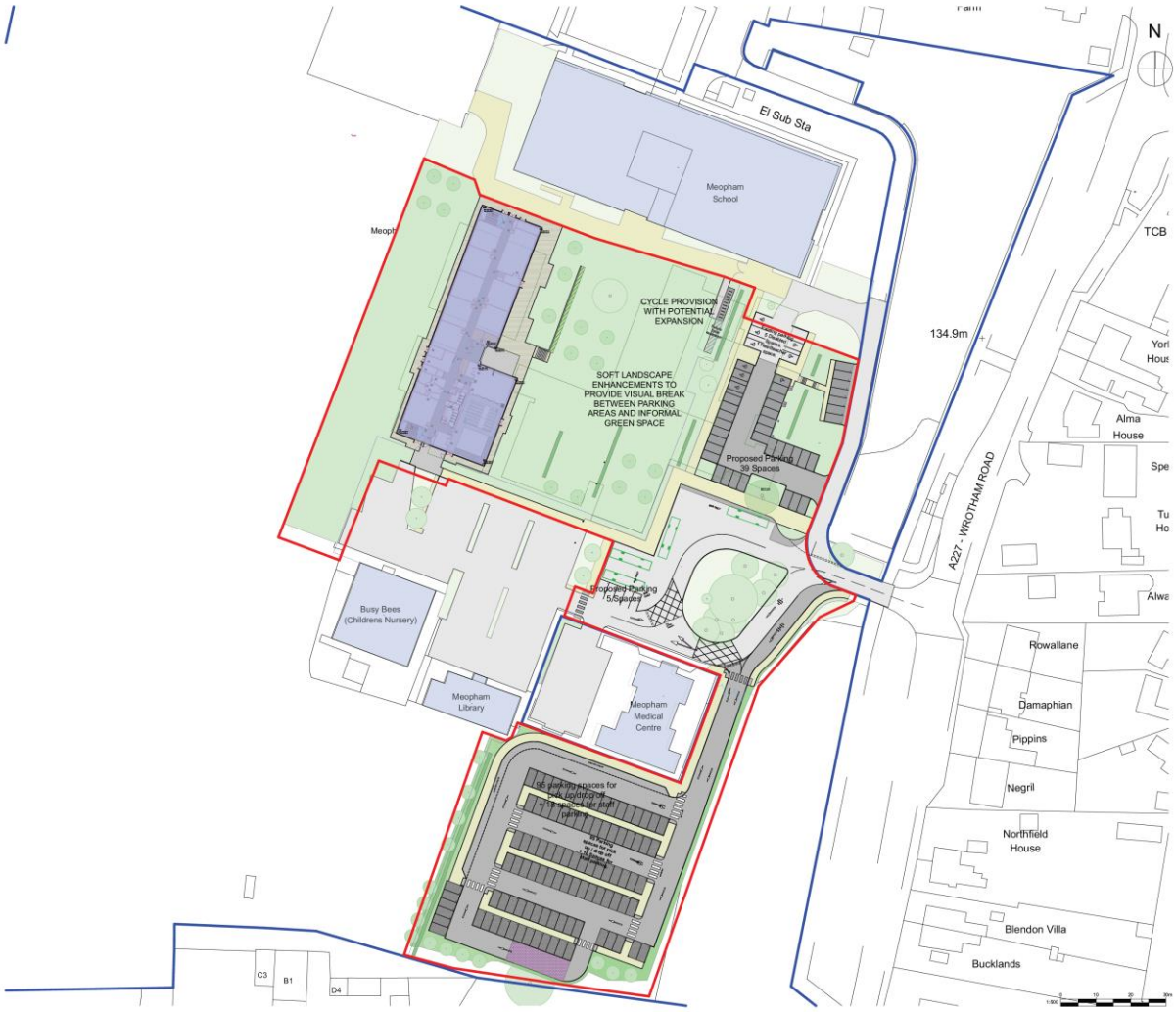
Site Location Plan with labels



Existing Site Location Plan

Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

Site Location Plan

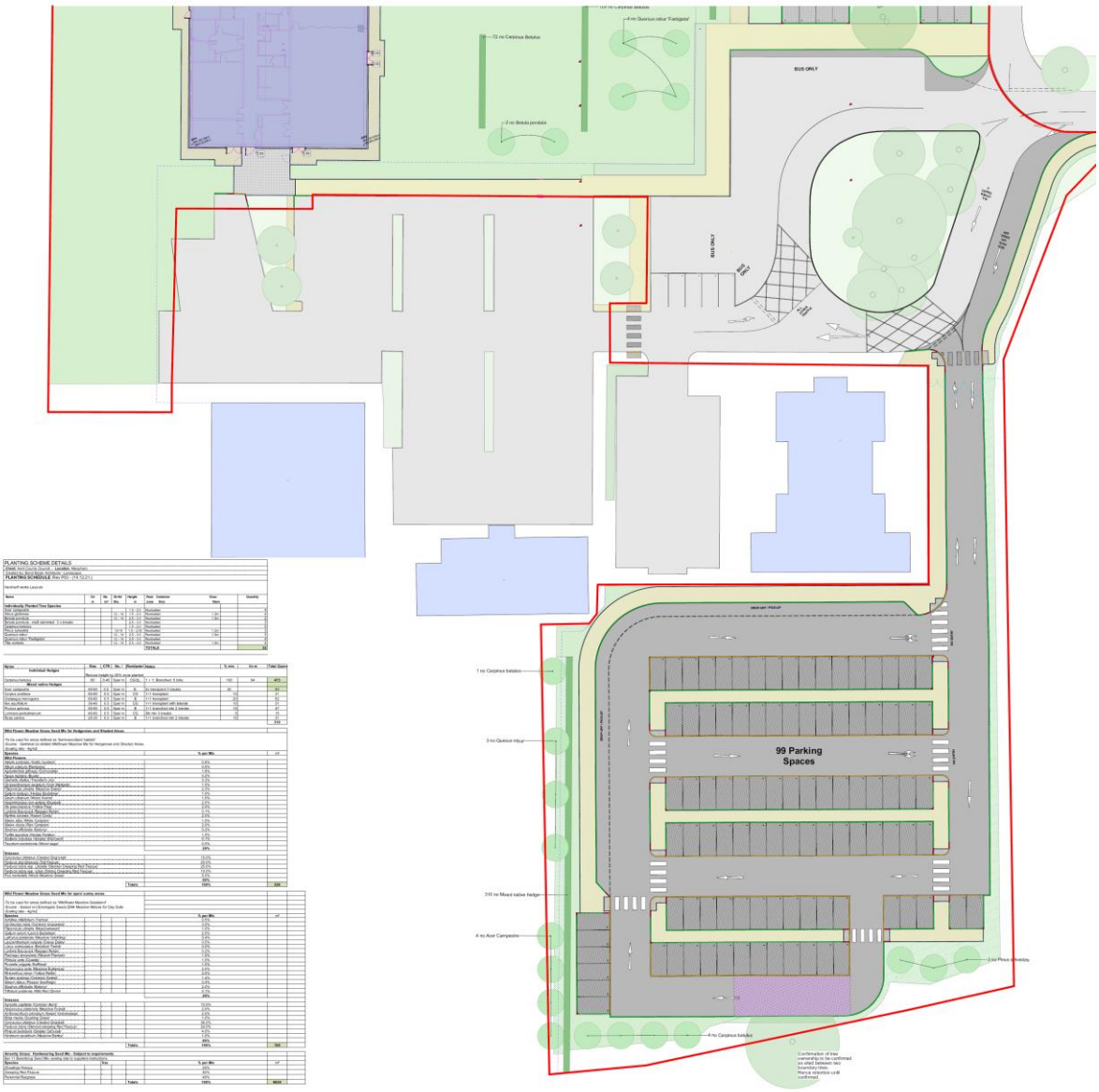


Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

Site Location Plan (northern part of the site)

Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

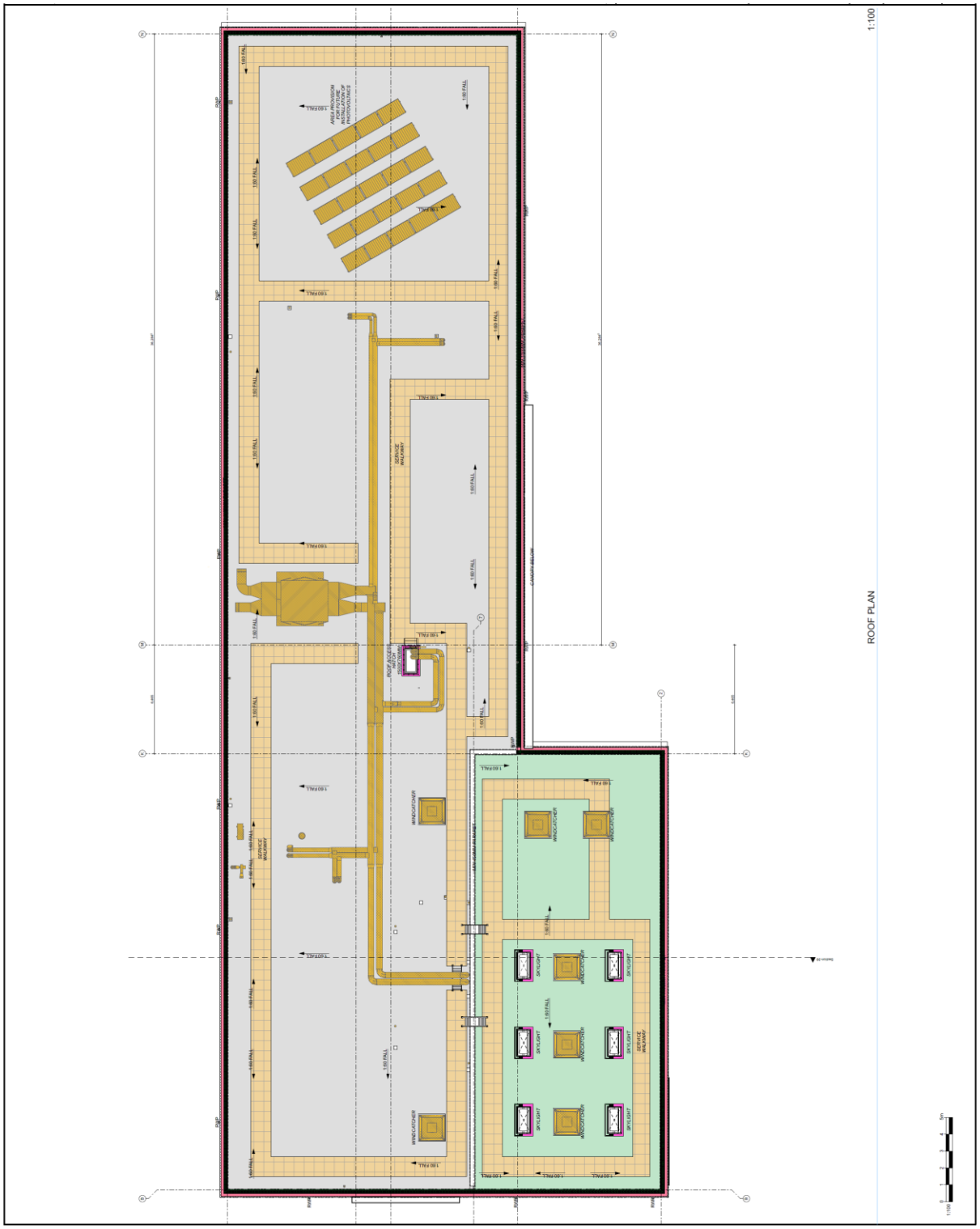
Site Location Plan (southern part of the site)



Proposed Ground Floor Plan

Proposed First Floor Plan

Proposed Roof Plan



Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

Proposed Elevations

Proposed 2-storey building, staff, and parent car park, drop off/pick up area – Meopham School, Wrotham Road, Meopham – GR/22/110

Site Aerial View

Birds Eye View

Site Access View

View From Existing School Reception

Front Elevation View

Rear Elevation View

New car park with pupil drop-off/pick up area (looking northwards)

New car park with pupil drop-off/pick up area (looking southwards)

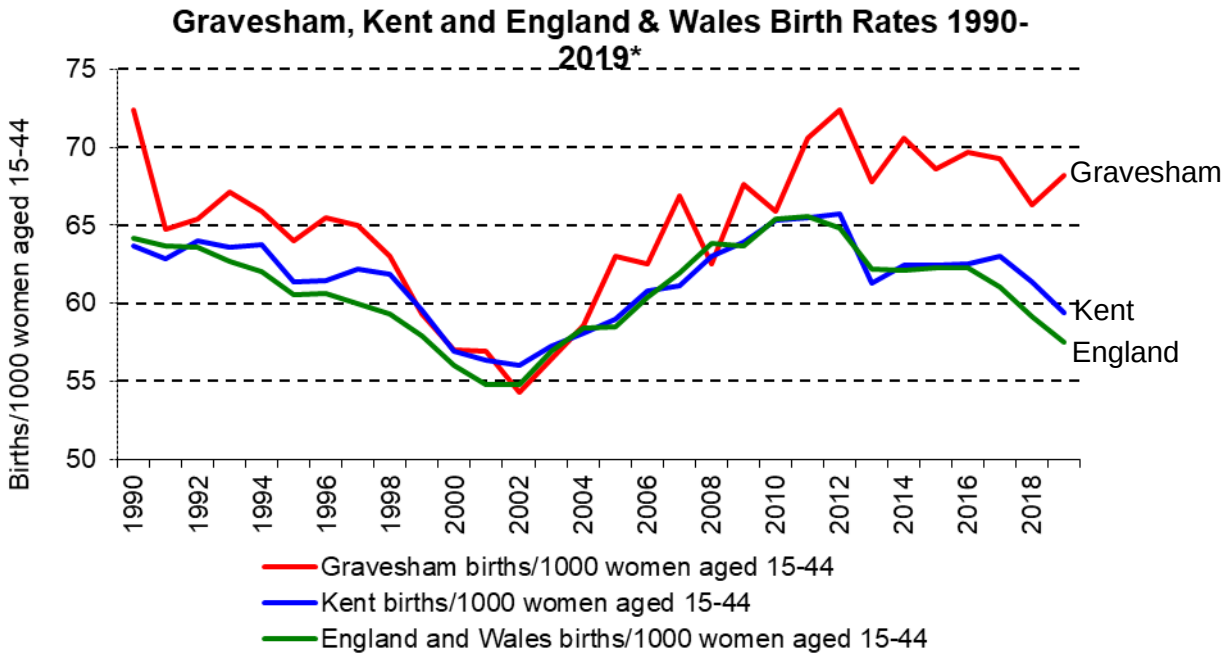
2. The original school site was laid out in a campus style with two and three storey blocks. The majority of the school was built in the 1970s using a CLASP (Consortium of Local Authorities Special Programme) building system (method of designing and assembling prefabricated buildings for use in the public sector). Planning permission was granted in 2016 to expand the school which involved the demolition of the existing 1970's school, and the erection a new 3-storey building completed in 2018 on an area to the north of the old school buildings.

3. As identified on the Gravesham Local Plan Policies Map (2014) the entire school site sits within the Metropolitan Green Belt, with the residential areas to the east and south of the site designated as 'rural settlements inset from green belt'. None of the trees within the application site are covered by a Tree Preservation Order (TPO) and according to the Environment Agency online flood mapping system, the application site is within Flood Zone 1 which corresponds to a low risk of flooding.

Background

4. Meopham School is a popular school with an Ofsted rating of 'Outstanding' and the School's proposal to increase the number of secondary places at the school is therefore, in line with the expectation of expanding a popular and successful school. The school was expanded in 2018 to provide for up to 798 pupils, comprising of 700 in Years 7-11 (PAN of 140 per year) and 98 in the sixth form. This expansion proposes to increase the Published Admission Number (PAN) by 60 Year 7 students per year. The School joined the Swale Academies Trust as an Academy on 1 February 2013. This planning application has been submitted by Kent County Council, as the Local Education Authority, as a Basic Needs Project.

5. Kent County Council (KCC) as the Local Education Authority has a statutory duty to ensure sufficient school places are available. The County Council's Commissioning Plan for Education Provision in Kent 2019-2023 is a five-year rolling plan which is updated annually. It sets out the future plans as Strategic Commissioner of Education Provision across all types and phases of education in Kent. Below is a graph showing the birth rates in Gravesham, Kent, and England.



6. Over the past ten years, the number of children born in Gravesham has continued to be higher than both Kent and national averages. It is anticipated that there would be significant pressure for additional Year 7 places in the Gravesend and Longfield Non-Selective Planning Group. Previous projections indicated that additional capacity would be needed for 2020/21, continuing for later years. The latest 2022-2026 Kent Commissioning Plan (KCP) shows the population continuing to be at a level significantly higher than the National or County average. These population increases have required the expansion of nearby primary schools, and the increased numbers arising from the primary expansions are now impacting on the secondary school capacity. Additionally, medium scale housing development and these high birth rates are bringing new families to the area and requiring enhancements to the infrastructure in order to meet the future needs of the borough and its residents.

7. The 2019–2024 Kent Commissioning Plan (KCP) provided the data that indicated a need to propose an expansion. The 2019-2024 KCP provided forecasts that indicated a sustained increase in the demand for secondary school capacity. Furthermore, this increased demand is showing no signs of reducing over the forecast period. KCC forecasts from the 2019-2024 KCP indicated a growing demand for Year 7 places in Gravesend from the start of the 2019-20 academic year. The Gravesend and Longfield Non-Selective Planning Group was forecast to have a deficit of 102 Year 7 places (3.5FE) from 2021-22 that increases to a deficit of 203 places (7FE) by 2023/24 reducing slightly to 175 (6FE) for 2025/26. The conclusion from two years ago identified a need for an expansion at Meopham School.

8. The latest iteration of the Kent Commissioning Plan (2022-26) reinforces the projections from the 2019 – 2024 KCP, and Gravesham continues to show a forecast deficit in year 7 places, even if Meopham were to continue to admit the increased number of 200 pupils per year group. These tables below indicate that there would a deficit in Year 7 places for the next intake and that continues for the forecastable future. There is a small amount of capacity for higher year groups, but that small surplus becomes a deficit by the September 2025 intake.

Planning Group	2020-21 capacity	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 capacity (F)	2027-28 capacity (F)	2027-28 capacity
Gravesham and Longfield Non-Selective	1,309	3	38	-75	-27	-66	-62	-37	1,324

Table showing **Year 7** surplus/deficit if no further action is taken.

Planning Group	2020-21 capacity	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 capacity (F)	2027-28 capacity (F)	2027-28 capacity
Gravesham and Longfield Non-Selective	6,281	167	186	79	46	-68	-132	-207	6,620

Table showing **Years 7 to 11** surplus/deficit if no further action is taken.

9. The Gravesham Borough Council Local Plan (adopted September 2014) states an intention to build 6,170 dwellings between 2011 to 2028. About 20% of the Ebbsfleet Development Corporation area is sited in Gravesham. During the 5-year period 2013-18 a total of 1,023 houses were completed with an average of 205 per annum. The deficit of places would be further exacerbated by limited options for alternative expansions within the Gravesham Borough area unless additional capacity can be created. This planning application has been submitted following an identified need to secure additional permanent secondary school places within the Gravesham Borough area.

10. There are seven secondary schools in the Gravesham and Longfield Non-Selective Planning Group. These are Longfield Academy, Meopham School, Northfleet School for Girls, Northfleet Technology College, Saint George's CE School (Gravesend), St John's Catholic Comprehensive School, and Thamesview School. Of these, St John's Catholic Comprehensive, Thamesview School, Saint George's CE School and Northfleet School for Girls have either been expanded or are the subject of a proposal to expand. Northfleet Technology College is under feasibility for an expansion and Longfield School has been offering additional school places under a local arrangement for several years. KCC as the Local Education Authority have confirmed that Meopham School is the only remaining candidate for expansion.

11. As mentioned above, the School expanded in 2018 when the new 3-storey building was constructed to provide accommodation for up to 798 pupils, comprising of 700 in Years 7 to 11 (PAN of 140 per year) and 98 in the sixth form (please note that the figure of 98 sixth formers was the maximum capacity that the school could accommodate – in reality there was actually less sixth formers as the table below shows). However, for the past 4 years the school has taken an additional 30 pupils each year in Year 7, bringing the PAN up to 170 pupils a year, at the request of Kent County Council as Local Education Authority. From September 2021/2022 the School started to take in an additional 30 pupils in Year 7 and thus starting the full 2 FE expansion of 200 pupils in Year 7. Due to a shortage of space within the 3-storey building for these additional pupils, they have been accommodated in temporary buildings on the site in five modular buildings. To accommodate the additional pupils for the September 2022/23 intake, two further

modular buildings are proposed to be erected on this school site under Permitted Development legislation. Below is a table illustrating the progressive expansion of admission numbers from 2018 to present day and then a projection to full capacity which would be reached by 2025/26.

	2018-2019	2019-2020	2020-2021	**2021-2022**	2022-2023	2023-2024	2024-2025	2025-2026
Yr7	170	170	170	200	200	200	200	200
Yr8	141	162	170	170	200	200	200	200
Yr9	147	159	162	170	170	200	200	200
Yr10	140	140	161	170	170	170	200	200
Yr11	140	140	140	170	170	170	170	200
6th Form	60	60	60	66	75	90	130	156
TOTAL	798	831	863	946	985	1030	1100	1156
Staff	*87*	*93*	*101*	*108*	*120*	*135*	*145*	*150*

Table illustrating the progressive expansion of admission numbers from 2018 to present day, and then a projection to full capacity by 2025-2026.

12. The proposed expansion of Meopham School would result in the Published Admission Number (PAN) increasing from 140 pupil to 200 pupils in Years 7 to 11 and a total of 1156 pupils at the school, with 1000 students in Years 7-11 and 156 students in the sixth form. As a result of this proposed 2FE expansion, the number of staff is also proposed to increase from 108 to 150 members of staff.

13. Located on the Meopham School site is also a medical centre, a library, a nursery and a fitness and tennis centre, which all use the same one access located off Wrotham Road (A227). Parking on the site is shared by all the various land users. The majority of the existing car park is not formally marked out and based on historic satellite imagery of the car park being occupied, approximately 175 cars are able to park on this site, although in this format the applicant has confirmed that in this format the bays and aisle widths would be substandard. The medical centre has its own 21 space parking area for staff and patients and the school has 5 disabled bays and 1 headteacher bay located adjacent to the school entrance, specifically for their use. School staff are therefore able to utilise any of these shared bays and signage is provided at the entrance to the site, directing vehicles to the parking areas.

Recent Planning History

14. The most relevant recent site planning history is listed below;

GR/21/316	Proposed 2 form of entry expansion, involving the erection of a new freestanding 2-storey school building, together with associated parking and landscaping works. Withdrawn.
GR/19/1121	Installation of a temporary single storey portacabin classroom building to be hired for a period of 3 years. Temporary planning permission granted with conditions.
GR/15/1233	Demolition of existing school buildings and replacement with a 3-storey block together with landscaping and associated ancillary works.

This planning application was dealt by Gravesham Borough Council because the school is now an Academy. Granted with conditions.

Amended planning application following the withdrawn application

15. A planning application was submitted in 2021, registered under planning reference GR/21/316 (KCC/GR/0041/2021) for the proposed 2 form of entry expansion, involving the erection of a new freestanding 2-storey school building, together with associated parking and landscaping works. This application was withdrawn prior to its determination to enable the applicant to review options to further improve the access and parking arrangements to help reduce the highways impact on Wrotham Road. The amended proposals, which now includes a dedicated pupil drop off/pick up area and car park is the subject of this application.

Proposal

16. This planning application has been submitted by Kent County Council Infrastructure Division as a Basic Needs Project and proposes to provide the accommodation required for the expanding school roll at Meopham School. The proposal is for a 2 Form of Entry (FE) expansion of the school and its sixth form provision and would result in a total of 1,156 pupils and 150 members of staff. The proposed development comprises of the following key components:
    - The construction of a freestanding 2-storey teaching block with a gross internal floor area (GIFA) of 2,360m2. The building would provide additional dedicated teaching and learning spaces. It would include general and specialised teaching spaces and supporting facilities as well as a music classroom, drama and dance studio and a main hall;
    - The provision of additional 42 car parking spaces for staff. A school only car park is proposed to be located near the main school building and would include 39 parking spaces for staff and include 4 accessible parking spaces and 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion;
    - The provision of another 99-space car park and pupil drop off/pick up area. This car park would include 18 parking spaces for staff which would comprise of the 3 new parking bays and 15 bays relocated from the location of the proposed bus only zone. The remainder of this proposed car park would provide 81 parking spaces for parents and another 14 vehicles would be able to park within the drop off/pick up zone, thus giving a total of 95 parent parking spaces;
    - The internal access road to be widened to two lanes to separate the traffic using the new 99 space car park and pupil drop off/pick up facility, and the traffic accessing the other facilities on this site;
    - The creation of a bus only zone to separate buses from other traffic and the relocation of the existing car parking spaces into the new 99 space car park;
    - Signage and road marking improvements;
    - Provision of 20 cycle parking spaces,
    - An array of PV panels is proposed in the roof, and
    - Landscaping works.

17. The school expansion is proposed to be delivered via a new freestanding 2 storey education building. The proposed new building is planned to be located in an area which accommodated the original school buildings referred to in paragraph 2 above which is now a grassed area and is used as an informal break out area. This part of the

school site has never been used for sport or recreation purposes. The remainder of this grassed area is intended to remain as social space for the students.

18. The two-storey building would be orientated north east to south west, with the classrooms/teaching areas accessed via a central corridor on each floor. A double height activity hall is proposed to the south east of the building, facing towards the main entrance to the school site. Access points to the building would be located at both ends of the building, and centrally adjacent to the activity hall, with staircases located at either end. The building would measure 69 metres in length by 26 metres in width, with a height of 10 metres (height from external ground level to top of parapet). The material palette of the proposed 2-storey building has been selected to blend in with the existing 3-storey school building and to inject a fresh and modern look to enhance the appearance of the site. The proposed material palette would be comprised of a light colour brickwork at lower level to emphasise the link with the ground and a mix of grey colour cladding for the upper levels which is proposed to re-create the horizontal views of the surrounding landscape. An array of Photovoltaic (PV) panels are proposed to be installed in the flat roof in the area highlighted on the proposed roof plan drawing.

19. The form, scale and massing of the proposed development has been designed to fit in with the existing buildings on this site. It is intended that the new 2-storey teaching building would have a secondary importance visually and functionally in comparison to the existing main 3-storey school building and would help the user understand the use of the two buildings. The topography of the site would also help to minimise the impact of the new teaching block on the existing environment as the site steps down from east to west. Therefore, the proposed building would be on a lower position from the main access to the site.

20. The applicant has confirmed that it is anticipated that some of the spaces within the new school building would be made available for community use out of school hours, but no details have been confirmed at this stage.

21. Access to the site would remain unchanged and be from the A227 Wrotham Road. The current access is a priority junction with a single lane entering and a single lane exiting the site and is shared by all the different land users on this site. Apart from the School there is a medical centre, a library, a nursery and a tennis and fitness centre, all accessing and exiting via this only access.

22. There are changes proposed to the internal access arrangements to provide additional on-site pupil drop-off/pick-up facilities (discussed below) to accommodate the proposed increase in pupils and which is proposed to improve the flow of traffic within the site and to reduce the potential for traffic backing onto Wrotham Road as occurs currently. These works are also proposed to improve access to the other land uses on this site during peak times. The internal road layout would be upgraded to improve the circulation of traffic within the site and to separate the school drop-off/pick-up traffic from the traffic associated with the other land users on this site. All on site pick up/drop off activity is anticipated to be within the confines of the new facility.

23. Upon entering the site, the carriageway would be split into two lanes and all traffic would be required to circulate around the internal 'roundabout' to exit the site. The left lane would lead to the new school drop-off/pick-up car park and the right lane would be used by all other traffic entering the site (including buses). As a consequence, traffic would no longer be able to turn immediately right upon entering the site to access the tennis and fitness centre, and this is proposed to reduce conflict near the site access and reduce the likelihood of traffic backing up as vehicles wait to turn within the site. Exiting the car

park would be via the same access road and back onto the internal roundabout. Traffic exiting the car park would be required to give way to traffic entering the site.

24. To accommodate the increase in staff, an additional 42 parking spaces (1 per new staff member), is proposed to be provided for staff. The parking currently on this site is shared between all users on the site. However, the new 42 space parking area provided would be for use by the school staff only.

25. A total of 39 car parking spaces are proposed to be provided at the front of the existing 3-storey school building. 32 of the proposed parking spaces would be located adjacent and connected to the existing 6 disabled bays near the main school building. An access to the additional parking area would be provided onto the internal access road to the tennis and fitness centre. 7 parking bays would be provided directly off the access road to the tennis and fitness centre and the remaining 3 parking bays would be provided in the new drop-off/pick-up car park, alongside the relocated existing staff parking spaces that need to be relocated as a result of a proposed bus only zone within the site. Within this car park it is proposed to provide 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion.

26. The School has confirmed that sixth formers do not drive onto the school site and on this basis, it is not proposed to provide any parking on this site for sixth formers.

27. Currently during the morning drop-off, pupils are predominantly dropped off within the site on the internal roundabout and during the afternoon collection, pupils are generally collected off-site. To accommodate the additional pupils as a result of the proposed expansion, a new drop-off/pick up car park is proposed which would be provided on land to the south of the medical centre. Entry to the car park would be via a short access road along the eastern boundary of the medical centre. All on site pick up/drop off activity would be within the confines of the new facility. The aisle widths would be 6m wide and allow for two vehicles to pass so as to improve circulation by allowing vehicles to use the “fast track” lane or pass by to access the car parking or exit the site.

28. The new car park would have a total of 99 parking spaces, of which 18 parking spaces would be for staff and would comprise of 3 parking spaces for new members of staff and the 15 parking spaces relocated from the location of the proposed bus only zone. In total it is proposed that there would be 95 parking spaces for parents to park, which includes 81 parking spaces and an additional 14 spaces within the pupils drop off/pick up area. Additional footways and zebra crossings would be provided within the new car park to allow pupils to safely navigate to parking bays. Additionally, a 2.5m wide footway would be provided on the new access road to the east of the medical centre, connecting to the existing footway to the north of the medical centre and another zebra crossing would be provided at the entrance to the medical centre, and across the car park aisle leading to the library and nursery. It is also intended to provide lighting within the new car park.

29. It is also anticipated that the new drop-off/ pick up car park would also be able to accommodate the increase in demand from visitors to the site during the day. The new parking area would also provide a parking area for visitors during special events at the school such as parents evenings.

30. The planning application also proposes to provide, in the first instance, 20 cycle parking spaces with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. However, given that few children currently cycle to school and as the school is not within cycling distance for many students due to its rural setting,

it has been proposed that the School would monitor the number of pupils that might cycle to the school through the School Travel Plan and if the demand for cycle spaces does increase beyond the initial 20 spaces, then further cycle parking would be added.

31. As part of the landscaping works it is proposed to retain all Category A (trees of high quality with an estimated remaining life expectancy of at least 40 years) on this site. However, there is a need to remove 5no. Category B trees, 7no. Category C trees, and 1no. Category U tree. To mitigate the loss of trees and maintain levels of amenity and biodiversity, it is proposed to plant new trees to the south and west of the proposed new pupil drop off/pick up car park area. Accordingly, there should be no net loss of trees and landscaping features across the site.

Planning Policy Context

32. The most relevant Government Guidance and Development Plan Policies summarised below are appropriate to the consideration of this application:

(i) **National Planning Policy Framework (NPPF) July 2021** and the **National Planning Policy Guidance** (first published in March 2014), sets out the Government's planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies would depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- Consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;

- Achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

  The great importance the Government attaches to Green Belts, with the fundamental aim of Green Belt Policy being to prevent urban sprawl by keeping land permanently open.

- Taking a positive approach to applications that make more effective use of sites that provide community services such as schools, provided this maintains or improves the quality of service provision and access to open space and making decisions that promote an effective use of land while safeguarding and improving the environment and ensuring safe and healthy living conditions;

- Ensure that planning policies and decisions provide the social, recreational and cultural facilities and services the community needs, by planning positively for the provision and use of shared spaces and community facilities such as sports venues or open spaces to enhance the sustainability of communities and residential environments;

- Conserving and enhancing the natural environment;

- Planning policies and decisions should prevent unacceptable risks from pollution and land instability and should ensure that new development is appropriate for its location;

In addition, Paragraph 95 states that: *The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive, and collaborative approach to meeting this requirement, and to development that would widen choice in education. They should give great weight to the need to create, expand or alter schools.*

(ii) **Policy Statement – Planning for Schools Development (15 August 2011)** which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. In particular, the Policy states that the Government seeks to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This would allow for more provision and greater diversity of provision in the state funded school sector, to meet both demographic needs, provide increased choice and create higher standards.

(iii)**Gravesham Local Plan Core Strategy 2014 – Adopted September 2014- Policies**:

Policy CS01 **Sustainable Development.** States that planning applications which accord with the policies in the development plan would be approved without delay unless material considerations indicate otherwise.

Policy CS10 **Physical and Social Infrastructure.** States that support would 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.

Policy CS11 **Transport.** States that new development should mitigate their impact on the highway and public transport networks as required. Transport assessment and travel plans should be provided and implemented to ensure travel choice and sustainable opportunities for travel. Sufficient parking in the new development would be provided in accordance with adopted parking standards.

Policy CS18 **Natural Environment.** States that proposals must not increase the risk of flooding on or off site and should seek to minimise the impact of drainage from new development on waste water systems. Proposals should seek to reduce the overall carbon footprint of the Borough.

Policy CS19 **Development and Design Principles**. Sets out a number of design principles that development must satisfy to ensure high quality design. This includes the need to respect the scale, massing, height, and

materials of local development. New development should include details of appropriate hard and soft landscaping. Car parking should be well related to the development it serves. New development should protect and, where opportunities arise, enhance biodiversity.

Strategic Objective S08 Green Belt. Preserve the openness of the Green Belt**,** maintain its national and local planning purposes and protect it from inappropriate development.

(iv) **Gravesham Local Plan First Review Saved Policies - 1994**:

It is considered that none of the saved policies are of relevance to this proposal. All of the policies concerning the Green Belt have been deleted and superseded by associated guidance in the NPPF.

Consultations

33**. Gravesham Borough Council:** Raises no objection to the planning application.

Meopham Parish Council: Raises objection to the planning application and has the following comments:

"Meopham Parish Council recognises that the applicant has taken note of the serious concerns raised in respect of the original application (this application was withdrawn following consultation) regarding on-site parking and the current application makes improved provision for such parking. However, Meopham Parish Council has resolved to object to the current proposal on the grounds that it does nothing to address the concerns expressed by it in respect of the original application relating to the capacity of the A227 to accommodate the additional traffic which the expansion of the school would generate.

The Council notes that 60 additional children would be going to the school in September 2022 whether this application is approved or not, to add to the extra 120 brought in in the last two years and thus there would in any event be a consequential increase in traffic flows at critical times. The Council is concerned that the planned admission limit for the school has been increased without proper consideration of the impact of the increase on the local infrastructure and therefore the local community.

It remains the position of the Parish Council that:

(i) That the main road running through the village and serving the school is not able to accommodate the extra traffic the development will generate. The Parish Council is very aware of the queues that build up in both directions on the A227 at the beginning and end of the school day with journeys taking significantly longer as a result.
(ii) The further transport study attached to the application fails to address the issues raised in the transport study commissioned by the Parish Council and submitted with its objection to the original application.
(ii) The extra traffic will add to the difficulties at the junction of the A227 and the access road into the site. The provision for additional parking on site will in fact exacerbate the problem if more cars are seeking to enter/exit the site at the start and end of the school day. Even with the improved parking provision there will still only be one entry/exit point. It is difficult for traffic to enter the main road currently. The additional traffic generated by the proposal will exacerbate the situation with

resultant heightened road safety issues. It is equally difficult for traffic turning right into the site to access the medical centre or other facilities there.

(iv) The development will adversely affect the amenity of local residents because of the additional off-site parking which will still be generated. There is already excessive on-street parking at both the beginning and end of the school day and the development will add significantly to it and may cause additional issues, including road safety issues in the residential roads in close proximity to the site. An illustration of the loss of amenity already endured by local residents is the delay to funerals at St. Johns Church on account of traffic queues generated at school leaving times.

(v) The development is inappropriate for the rural locality. The additional car parking makes the development even less sympathetic with the rural surroundings. It is not required to meet the needs of the population of Meopham and other neighbouring rural parishes as evidenced by the number of pupils already travelling to the school from the urban areas to the north and west of the village.

(vi) Despite the fact that our concerns have always focussed on the inadequacy of the A227 to support extra traffic, the new application is deficient in that it does not suggest any additional traffic initiatives including dedicated bus/minibus routes to reduce the need for car journeys. In fact the Parish Council doubts that even if such bus journeys were added the impact on traffic flows would be significant as parents may still choose to transport their children to and from school".

The Parish Council had previously commissioned an independent Traffic Consultant to appraise the planning application that was withdrawn. The document was entitled 'Highways Technical Appraisal in Respect of Application to KCC Planning Committee – Reference KCC/GR/0041/2021'. Upon receiving of the above-mentioned comments to the current application, the Parish Council refers (in point (ii) above) to this Technical Appraisal, and so the Parish Council was asked to re-submit this document as part of their response. The Technical Appraisal document was forwarded to the applicant to be considered alongside the Parish Council's comments above. Please note that the Technical Appraisal does not consider the proposed mitigation measures that have submitted as part of this current planning application.

Kent Highways: Initially raised a holding objection to the planning application.

The first holding objection was received from Kent Highways on 1 March 2022, requested additional information pending the submission of mitigating measures to reduce the number of private cars travelling to the site; consultation with the Gravesham Borough Council Parking Manager to possibly introduce parking restrictions on the A227 Wrotham Road and the residential roads on the eastern side of Wrotham Road to reduce the excessive and inappropriate parking in those roads; consultation with the KCC Public Transport Team to consider any additional bus services required to the school and to decrease the percentage of pupils and staff travelling to and from the school by private car and to produce a more robust School Travel Plan supported by the school and recorded on the Jambusters web site to increase the sustainable travel modes for travel to and from the school.

A second holding objection was received from Kent Highways on 23 May 2022, requesting further consultations to take place with KCC Public Transport as the requested improvements to bus services had not been fully addressed and for further consultation to take place with the School to produce a fully robust School Travel Plan. The requested consultation to take place with Gravesham Borough Council Parking Manager had been satisfactorily addressed and is set out in the comments below:

"Discussions between the applicant's Transport Consultant and the GBC Parking Manager suggested that he [*GBC Parking Manager]* considered that there were already adequate parking restrictions on Wrotham Road and did not consider that any on-street parking restrictions on the residential roads were appropriate. He stated that any highway safety related restrictions were the responsibility of the Highway Authority and any obstructions or inappropriate parking were the responsibility of the police.

It was stated in the applicant's Transport Consultant's response that the school was committed to patrolling nearby roads by staff to deter inappropriate parking by parents e.g. blocking driveways but this was of concern in terms of safety *[to Kent Highways]* and not considered appropriate. It also stated that the school would promote a publicity campaign to encourage parents to use the new drop-off / pick-up parking area which is welcome.

Kent Highways subsequently contacted the GBC Parking Manager regarding the response who agreed that the usage of the new pick-up/drop off area was an unknown factor but also agreed that school staff should not be involved in traffic / parking issues off-site. He confirmed that the school should regularly liaise with him regarding any known problems but should contact the police for any cases of obstruction *[this has been included in the Action Plan of the School Travel Plan]*. He did not consider that it was appropriate for any additional financial contribution to improve coverage by Enforcement Officers but the later would be aware of the local concerns and try to talk to drivers.

In conclusion, Kent Highways consider that the applicant has carried out the discussions with GBC Parking Manager as requested and, other than requesting that the school communicates the impact on local residents of inappropriate parking and liaising fully with the Parking Manager, I consider that my concerns on this issue have been fully investigated and I accept there is nothing further to be considered".

Following receipt of all the requested additional information (listed above), **Kent Highways** raise **no objection**, subject to the imposition of a number of planning conditions (listed below) and a financial contribution towards public transport capacity improvements and monitoring of the School Travel Plan. The following comments have been made:

"I refer to my previous consultation responses dated 1st March 2022 and 23rd May 2022 in which I requested a holding objection whilst the bus service improvements and School Travel Plan details were finalised. In the latter document I agreed that my objection in respect of the parking restrictions in the local roads be withdrawn after discussions took place with Gravesham Borough Council's Parking Manager.

Discussions have since taken place with both the applicant and the KCC Public Transport Team resulting in a Memorandum of Understanding (MOU) between the County Council's Children, Young People and Education (CYPE) and Highways Transportation & Waste (HTW) Directorates which provides financial resources to enable additional bus services to be provided should additional demand be forthcoming in the next 5 years. This is closely linked with the School Travel Plan (STP) which expects to increase the bus usage during this period. The MoU also provides for a £5000 towards monitoring of the STP and ensuring that the targets to reduce travel by the private car are being met and adjustments made where necessary.

A draft version of the STP (Revision 13) has been submitted that is found acceptable to both the Active Travel Interventions Team (who monitor School Travel Surveys through the Jambusters web site) and KCC Highways. It is a requirement that a travel survey of

both pupils and staff is made annually and any adjustments, with possible additional mitigating measures, to that STP are submitted for approval should the targets not be met. I find this acceptable.

I therefore am able to withdraw my previous holding objection on the basis that my above two concerns have been satisfactorily addressed. It is my opinion that the on-site layout and parking improvements, supported by the other mitigating measures referred to above will combine to ensure that the proposed increase in pupil and staff numbers as a result of the expansion of the school will not result in highway safety or congestion issues. In conclusion, therefore, I raise no objection to the application on highway grounds provided the following conditions are applied to any consent granted.

1. A Construction Environmental Management Plan shall be submitted and approved prior to any works commencing on the site. The CEMP shall include, but not exclusively, the following issues:
   (a) Routing of construction and delivery vehicles to / from site
   (b) Parking and turning areas for construction and delivery vehicles and site personnel
   (c) Timing of deliveries
   (d) Provision of wheel washing facilities
   (e) Temporary traffic management / signage.

2. A minimum of 10% of the new staff parking spaces (excluding the drop-off / pick-up spaces) shall be provided with Electric Vehicle charging points. In addition, a further 20% of the new spaces (excluding the drop-off/pick-up spaces) shall be provided with passive service i.e. ducting/cabling only). Details and location of these shall be submitted and approved by the LPA prior to first occupation of the new buildings.

3. Travel Surveys of both staff and pupils to be undertaken annually in accordance with the submitted School Travel Plan and compared to the targets given. Any further mitigating measures, if the targets are not met, to be submitted to and approved by the LPA. Any identified shortfall in the bus services to be appropriately addressed in accordance with the submitted MoU regarding provision of bus services.

4. The Car Park Management Plan is to be monitored and reviewed annually as part of the annual School Travel Plan review.

5. The revised internal road layout and bus stopping / turning area to be completed prior to first occupation.

6. The proposed drop-off / pick-up area as shown on the submitted plans to be completed and fully operational prior to first occupation of the new buildings.

7. The submitted Car Park Management Plan to be reviewed annually in co-ordination with other on-site operators and any amendments to be submitted and approved by the County Planning Authority.

8. The car parking numbers as shown on the submitted drawings shall be provided prior to first occupation and shall thereafter be maintained for that sole purpose.

9. A minimum of 20 secure and weatherproof cycle parking spaces shall be provided prior to first occupation in accordance with details to be submitted to and

approved by the LPA and shall be maintained thereafter, and with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. The number of cycle parking spaces shall be reviewed annually alongside the School Travel Plan and the number of spaces increased if necessary.

An Informative is recommended regarding obtaining any necessary highway approvals".

In addition, the Highway Authority requires a financial contribution towards public transport capacity improvements and monitoring of the School Travel Plan.

School Travel Planner: Raises no objection to the School Travel Plan (Draft 13).

Archaeology: Raises no objection subject to the imposition of a condition requiring a programme of archaeological works to be undertaken in accordance with the submitted documentation.

KCC's Biodiversity Officer: Raises no objection subject to the imposition of conditions including a pre-commencement condition, relating to precautionary mitigation measures for dormouse, badgers and breeding birds; implementation of habitat creation and reptile mitigation works within the Additional Ecological Assessment; completion of reptile mitigation works as detailed in the Proposed Enhancement and Mitigation Plan within the Additional Ecological Assessment; a signed Impact Assessment and Conservation Payment Certificate signed by Natural England; the Construction Management Plan to include a detailed plan demonstrating the location of the heras fencing to protect the reptile habitat, and any lighting condition requires the lighting plan to follow the recommendations within the Bats and Artificial Lighting in the UK document

Kent County Council's Flood Risk Engineer: Raises no objection to the planning application subject to the imposition of conditions including a pre-commencement condition relating to contamination and no infiltration of the surface water drainage.

Environment Agency: Raises no objection to the planning application subject to the imposition of two conditions relating to contamination and infiltration of surface water drainage.

Sport England: Raises objection to the planning application and has the following comments:

"It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework particularly Para 99) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document':

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

Sport England Policy Exceptions

E1
A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

E2
The proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

E3
The proposed development affects only land incapable of forming part of a playing pitch and does not:
- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

E4
The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
- of equivalent or better quality, and - of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

E5
The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Assessment against Sport England Policy/NPPF

The proposal is for an expansion of the school including the development of a new staff car park on part of the existing playing field. The current proposal includes a new freestanding building that was previously the subject of withdrawn application reference GR/0041/2021 to which Sport England had no objection since it had minimal adverse impact on the extent and capacity of the playing field. It is understood that that application was withdrawn following objections from local residents regarding the potential of the new building to cause an increase in traffic visiting the school. The current application is an attempt to resolve those concerns by providing additional parking on the school site.

The Development Management Procedure Order defines a playing field as 'the whole of the site which encompasses at least one playing pitch'. Sport England considers the area that would be affected by the additional parking to constitute part of the larger playing field of the school and therefore, to be part of the current playing field. Additionally, this part of the playing field has been used for playing pitches in its own

right within the previous five years (see Google image below paragraph 82 which was taken in May 2018).

There is no proposal to replace the area of playing field that would be lost and the proposal does not meet any other exception to our policy.

Conclusion

In light of the above, Sport England objects to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 99 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State, via the Planning Casework Unit".

Local Member

34. The local County Member Mr Bryan Sweetland was notified of the application on 3 February 2022. Mr Sweetland has made the following comments:

"The extra traffic will add to the difficulties at the junction of the A227 and the access road into the site. The provision for additional parking on site will in fact exacerbate the problem if more cars are seeking to enter/exit the site at the start and end of the school day. Even with the improved parking provision there will still only be one entry/exit point. It is difficult for traffic to enter the main road currently. The additional traffic generated by the proposal will exacerbate the situation with resultant heightened road safety issues. It is equally difficult for traffic turning right into the site to access the medical centre or other facilities there.

The development will adversely affect the amenity of local residents because of the additional off-site parking which will still be generated. There is already excessive on-street parking at both the beginning and end of the school day and the development will add significantly to it and may cause additional issues, including road safety issues in the residential roads in close proximity to the site".

Publicity

35. This application was advertised by the posting of a total of 10 site notices in the vicinity of the school entrance along Wrotham Road, between The Street and Meopham Village Hall. A press notice was published in the local newspaper on 10 February 2022.

Representations on the planning application

36. A total of 21 representations have been received from local residents objecting to the application. Of these 21 representations, a total of 10 representations received were the same letter sent by 10 different individuals. The main points of objection are summarised below:

Congestion and Traffic Generation

- The additional vehicle movements that this application would generate would amount to more congestion, cause significant delays, inconvenience to local residents and increase the risk of accidents.

- The volume of traffic on the A227 is already at unacceptably high levels due to it being used as a rat-run to avoid congestion on major roads in the surrounding area, including heavy goods vehicles which constantly have to cross over into the oncoming lane as they are too wide and totally unsuitable to be driving through Meopham village. This level of traffic is only going to increase in the near future due to housing development etc.
- Meopham Community Academy, Playpen Pre-School and Helen Allison School are also situated nearby at the junction of Longfield Road and the A227 which is adjacent to the shops at the Parade. This area also becomes extremely busy and congested at school start and finish times which results in unsafe parking practices and traffic jams.
- The single lane access and exit road into the site is also used by Meopham Medical Centre, Busy Bees Nursery, Meopham Fitness Centre, and Meopham Library, all of which create an additional flow of traffic in and out of the school site onto the Wrotham Road junction.
- Allowances have been made for additional parking and drop off points but the fact is there is one entrance to the site which effectively creates a bottle neck. The additional on-site car parking could make the situation worse.
- Vehicles queuing to enter and leave the site would cause congestion on both southbound and northbound sides of the A227. This would result in an obscured view of oncoming traffic, particularly by HGVs, buses, and other large vehicles, creating the need for cars leaving the school to edge out posing a hazard to oncoming traffic, particularly to motorbikes overtaking queuing vehicles, as well as an increased risk to cyclists and pedestrians.
- The entrance is gridlocked twice a day and a separate entrance and exit are needed with tidal traffic control rather than the frankly lame plan currently suggested.

Parking on local roads

- Parents currently park in local roads to pick up and drop off pupils. This blocks access to properties, is inconsiderate and in cases illegal, and can cause gridlock.
- Cars are often waiting as early as 2pm to pick up pupils meaning that cars would still be using Wrotham Road if the car park is already full.
- There is no assurance that parents would not continue to park away from the school site but merely that it will "help discourage" them from doing so. There is and will not be any parking enforcement arrangements in place to prevent this from happening in the future.

Other matters

- Cars queuing would result in an increase in air pollution at school start and finish times posing a risk to the wellbeing of children who can suffer a range of health impacts as a result.
- Cycling in the vicinity of the school is currently not well provided for and the additional traffic would make local roads even more hazardous for cyclists.
- It is considered that the proposed development is inappropriate for the rural locality.

Discussion

37. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph (32) above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 70(2) of the Town and Country Planning Act 1990 provides that the local planning authority shall have regard to the provisions of the development plan, so far as material to the

application, and to any other material considerations. The proposal therefore needs to be considered in the context of the Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), and the Planning Policy Statement for Schools and other material planning considerations including those arising from consultation and publicity.

38. This application is being reported for determination by the Planning Applications Committee due to letters of representation received from the Local Member, Meopham Parish Council, Sport England, and local residents objecting to the planning application. In this case the key determining factors, in my view, are need and the principle of the development, design and impact upon local amenity, Green Belt considerations, the Sport England objection, biodiversity and traffic and parking considerations.

39. In the Government's view, the development of schools is strongly in the national interest and planning authorities should support this objective, in a manner consistent with their statutory obligations. In considering proposals for the creation, expansion and alteration of schools, the Government considers that there is a strong presumption in favour of state funded schools, as expressed in the National Planning Policy Framework and reflected in the Policy Statement for Schools. Planning Authorities should give full and thorough consideration to the importance of enabling such development, attaching significant weight to the need to develop state funded schools, and making full use of their planning powers to support such development, only imposing conditions that are absolutely necessary and that meet the tests set out in paragraph 56 of the NPPF.

Need and principle of development

40. As outlined in paragraph 32 of this report, the National Planning Policy Framework (NPPF) supports the provision and retention of community facilities as a means of place making and promoting healthy and sustainable communities. Decisions should be made which guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. It should also ensure that established facilities and services are able to develop and modernise in a way that is sustainable and retained for the benefit of the community.

41. Additionally, Paragraph 95 of the NPPF states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive, and collaborative approach to meeting this requirement and to development that would widen choice in education. They should give great weight to the need to create, expand or alter schools, and work with school's promoters to identify and resolve key planning issues before applications are submitted. There is similar strong policy support in the Government's Planning Policy Statement for Schools (2011).

42. The application site forms part of a wider established education site, namely Meopham School, together with associated parking areas and open playing field. The proposal is to accommodate a 2FE (60 pupils per year in Years 7 to 11) expansion to help meet an identified demand for additional non-selective secondary school places in the Gravesham Borough area.

43. As referred to above, the School expanded in 2018 when the new 3-storey building was constructed to provide accommodation for up to 798 pupils, comprising of 700 in Years 7 to 11 (PAN of 140 per year) and up to 98 in the sixth form. However, to meet educational needs for the past 4 years the school has taken an additional 30 pupils each year in Year 7, bringing the PAN up to 170 pupils a year, at the request of Kent County

Council as Local Education Authority. From September 2021/2022 the School admitted an additional 30 pupils in Year 7 and thus starting the full 2 FE expansion of 200 pupils in Year 7. Due to a shortage of space within the 3-storey building for these additional pupils, their needs have been accommodated in temporary buildings on the site in five modular buildings. To accommodate the additional pupils for the September 2022/23 intake, two further modular buildings are proposed to be erected on this school site pursuant to Permitted Development Rights. The applicant has confirmed that to be able to accommodate the existing pupils already on this site and the proposed pupils, there is a clear needs case for proposed permanent development at this site. Following the provision of permanent accommodation the temporary modular buildings would be removed from site.

44. Support for the provision of school places is also heavily embedded in the NPPF, and I consider that the education need for the proposed development should be given significant weight in this instance. There is considerable demand for non-selective secondary school places in Gravesham, as outlined in paragraph 5 above, and to ensure the future provision of secondary education in Gravesham. In considering the above, I accept the need for the proposed development.

Green Belt Considerations

45. By virtue of the criteria in the NPPF the development is inappropriate in Green Belt terms. Although paragraph 149 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, I consider that the proposals would not meet these exceptions and that the development is inappropriate. Inappropriate development is, by definition, harmful to the Green Belt and it is for the applicant to demonstrate why permission should be granted. Such development should not be approved, except in very special circumstances. It is, therefore, necessary to consider the impact of the development on the openness of the Green Belt and whether or not there are very special circumstances that would warrant setting aside the general presumption against inappropriate development.

46. Whilst the proposed new 2-storey building is located in a part of the site previously occupied by school buildings, it is accepted the proposals would lead to an intensification of the existing use of the site, and an increase to on-site build massing. This therefore constitutes inappropriate development by virtue of not falling into any of the Green Belt exception categories. However, the applicant considers that there are 'Very Special Circumstances' that exists which would sufficiently outweigh the presumption against inappropriate development in the Green Belt.

47. A Planning Statement was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against inappropriate development in the Green Belt. The applicant considers the following 'very special circumstances' are sufficient to collectively outweigh any Green Belt policy objection:

    i) The identified education need and operational need for additional secondary schools places in Gravesham;
    ii) A lack of suitable alternative development options;
    iii) The need for a dedicated pupil drop off/pick up facility;
    iv) The extent of community and sustainability benefits the proposal would deliver; and,

v) The quality of the design and level of mitigation proposed that would ensure that the impact on the openness of the Green Belt would be substantially limited in comparison to the existing school site.

Each of these 'very special circumstances' as put forward by the applicant will be considered and discussed in the following section of this report. I will take each point in turn, first considering the case of need for additional secondary school places in Gravesham.

Case of need

48. As outlined in paragraph 32 of this report, great emphasis is placed within planning policy generally and specifically in paragraph 95 of the NPPF, on the need to create, expand or alter schools. The NPPF states that Planning Authorities should take a proactive, positive, and collaborative approach to meeting this requirement, and to development that would widen choice in education. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government's commitment to support the development and expansion of state funded schools to adapt and improve their facilities. There is a presumption in favour of the development of state funded schools and their facilities expressed in both the NPPF and the Policy Statement – Planning for Schools Development. Policy CS10 of the Local Plan Core Strategy seeks to support the development of infrastructure facilities required to resolve existing deficiencies of 'infrastructure encompassing education and community facilities.

49. These very specific local education planning objectives are then supported at national level with the NPPF, at paragraph 95, stating that the government is committed to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities. The importance of skills development to increasing equality, promoting social cohesion, and improving economic efficiency are themselves core objectives of the various policies outlined above in paragraph 32.

50. The applicant has confirmed that over the past ten years the number of children born in Gravesham has continued to be higher than expected. It is anticipated that there would be significant short and medium-term pressure for additional Year 7 places in the Gravesend and Longfield Non-Selective Planning Group which indicated that additional capacity is needed for 2020/21, continuing for later years. These population increases have required the expansion of nearby primary schools, and the increased numbers arising from the primary expansions are now impacting on the secondary school capacity. Medium scale housing development and these high birth rates are bringing new families to the area requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. The 2022 – 2026 Kent Commissioning Plan provided forecasts that indicate a sustained increase in the demand for non-selective secondary school capacity. Furthermore, this increased demand is showing no signs of reducing over the forecast period.

51. The deficit of places would be further exacerbated by limited options for alternative expansions within the Gravesham Borough area unless additional capacity can be created. Meopham School is a popular school with an Ofsted rating of 'Outstanding' and the proposal to increase the number of secondary places at the school is therefore, in line with the expectation of expanding popular & successful schools. Furthermore, the proposed 2FE expansion of the existing school would help secure additional non-selective secondary places to meet the forecasted increase in demand due to the larger primary cohorts emerging from Gravesham primary schools.

52. Based on the above, in my view it is evident that a clear case of need for additional secondary school places within the Gravesham Borough area exists, which is largely within the Metropolitan Green Belt. Its needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as much as those outside of the Green Belt. The applicant has provided both existing and projected figures which demonstrate an existing shortfall within the Gravesham Borough area, and a future need which would be outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF, and I consider that the need for the development should be given significant weight in this instance. Having accepted a need for additional secondary school places with the Gravesham Borough area, it is now important to consider how these places would be provided.

Alternative Development Options

53. As part of the applicant's case of very special circumstances, alternative development options have been assessed as part of the process to propose an expansion to the Meopham School, the Area Education Officer assessment of alternative sites and possibilities was undertaken by the Local Education Authority. There are seven secondary schools in the Gravesend and Longfield Non-Selective Planning Group. These are: Longfield Academy, Meopham School, Northfleet School for Girls, Northfleet Technology College, Saint George's CE School (Gravesend), St. John's Catholic Comprehensive School and Thamesview School.

54. Of these, St John's Catholic Comprehensive School, Thamesview School, St George's CE School and Northfleet School for Girls have either been expanded or are the subject of a proposal to expand. Northfleet Technology College is under feasibility for an expansion and Longfield School has been offering additional places under a local arrangement for several years. Meopham School is the only remaining option for expansion and has the space to do this without impacting on its playing field provision.

55. The Local Education Authority has a statutory duty to provide sufficient school places and on balance, to address the current and future demand for additional non-selective secondary places, considers that Meopham School provides the best solution to ensure that the local communities in Gravesham have access to a school of their choice which offers high quality teaching facilities

56. In summary therefore, and having considered the above, I am satisfied that the applicant has taken all reasonable endeavours to consider all possible sites for expansion within the Gravesham Borough area and that all the other potential sites have either been expanded or are the subject of a proposal to expand. Therefore, I accept this is the only viable option in this instance. The site is available, suitable, deliverable and in the correct location to address the need for additional non-selective secondary school places in the Gravesham Borough area. Moreover, the site has an established educational use, and includes some previously developed land within the Green Belt. In light of the above, I consider the redevelopment of the application site to be the most appropriate solution in this instance. Having accepted the need for the development, and the suitability of the proposed application site, the following sections of this report would concentrate on the very special circumstances put forward by the applicant with regard to the redevelopment of the application site itself.

Wider Community Benefits

57. The applicant considers that the proposed development would lead to several demonstrable community benefits. The first of these is the improved educational facilities that the proposals would provide much needed and additional non-selective education facilities within the Gravesham Borough area. A more direct community benefit would be the improved facilities, which would not only be available to pupils, but to the wider community, once the details have been agreed upon by the School and which can be secured by a planning condition.

58. The application as proposed seeks to provide additional and non-selective secondary school places within the Gravesham Borough area, removing the need for local pupils to travel out of the Borough to obtain the necessary level of education. Furthermore, the proposals make provision for new cycle parking spaces, a dedicated bus parking area, a new car park which would allow for parents to drive onto the school site to drop off and collect pupils and the improved pedestrian facilities within the site. The applicant considers that these are attributes, in conjunction with the implementation and continued monitoring of the School Travel Plan and the Car Park Management Plan, to ensure that the additional traffic and parking is managed.

59. Although both of the above are positive attributes of the scheme as proposed and do go some way to support the redevelopment of this Green Belt site, I do not consider that these benefits on their own would outweigh the presumption against inappropriate development within the Green Belt. I therefore consider that the impact of the development as proposed on the openness of the Green Belt needs to be addressed, which, in conjunction with the above, may collectively outweigh the harm to the Green Belt.

The need for a dedicated pupil drop-off/pick up facility

60. The applicant previously submitted a planning application for a 2 Form of Entry expansion to Meopham School in March 2021. That planning application attracted a number of representations from the local community, with the focus of concern being the potential impact of the proposal on highways and parking. The applicant withdrew that scheme in June 2021, to enable the design team to review all of the feedback in detail and develop an improved proposal based on the feedback from the local community. The applicant considers that the scheme now represents a substantially improved proposal which, crucially, now includes a new dedicated school car park area with a pupil drop-off and pick-up facility which should significantly reduce the impact of the proposal on the local highway network.

61. This additional feature of the proposal is specifically required to help mitigate the impact of the proposal on the local highway network, which in turn is being driven by the education need for this project. The applicant considers that this additional mitigating feature, and critical piece of infrastructure, is necessary to address the proposed increase in pupils and the associated traffic and parking that this application would generate. I therefore consider that the new pupil drop off/pick up area to serve an expanded secondary school could be considered to be a Very Special Circumstance.

Impact on the Openness of the Green Belt

62. It is accepted that the proposal would lead to an intensification of the site and an increase in on-site building massing and additional hardstanding. In this regard, it is acknowledged that there would be a greater impact on the openness of the Green Belt

when compared to the impact associated with existing site conditions. However, it is contended that, through pre-application consultations, a carefully thought-out high-quality design and mitigation package has emerged that, upon implementation, would substantially limit and go some way to mitigate the impact associated with the proposal on the openness of the Green Belt when compared to existing site conditions. In order to undertake this 'openness' assessment, careful consideration needs to be given to the extent of impact on openness from the existing school and how the proposal impacts on the locality, and in particular any impact on views into the Green Belt.

63. Whilst full consideration is given on these matters, it is important to note that the site is well screened from public views by mature trees and other forms of soft landscaping along all its boundaries and especially to the east facing Wrotham Road. The proposed development does not seek to significantly alter any of this boundary landscaping, and thus the site would continue to be well screened from the surrounding area and, even where limited views into the site exist, the overall appearance and character of the site would be generally unaffected by the proposals, especially when set against the context of the existing school building and surrounding buildings also within the Green Belt, including the medical centre, the library, the nursery and the fitness and tennis centre.

64. Moving onto the new building itself, this would add a further 2,401m2 of GEA floorspace within a two-storey flat roof building. In terms of topography, the site steps down from the east to the west. This would help to significantly reduce the visual impact of the new building since it would be positioned on a lower position of the site when compared to the site entrance at Wrotham Road. In addition, the new 2-storey building would be lower than the existing school block which is 3-storeys in height. To help further reduce its visual impact on the openness of the Green Belt, the existing school site benefits from substantial visual screening afforded by boundary landscaping along the Wrotham Road boundary. There would be limited views of the new building when viewed from the east.

65. It should be acknowledged, that the location of the new building is where the original school buildings were located before they were demolished and replaced with the current 3-storey school block. In this respect, the massing of the new build would not be significantly different to historic build massing on site. It is understood that the original school buildings varied in height between two and three storeys. In addition, the new building has been designed to be sub-servient to the existing 3-storey building both in terms of its presence, massing, and architectural finish. It is proposed to have secondary importance in comparison to the existing school and the design of the proposed building has been heavily influenced by the surrounding area and wider landscape character. This is emphasised using horizontal volumes on the facade and slight difference in the colour palette for the cladding.

66. The other aspect of the proposal to note is the additional new car park and pupil drop-off pick up car park area. This new mitigating feature is proposed to be located immediately south of the Meopham Medical Centre. Immediately to the east is a heavily wooded area (separating the new car park from Wrotham Road), to the south is the school boundary denoted by an avenue of trees, and to the west is the school playing field. The new car park area would not include any buildings or structures but would include some low-level lighting columns to ensure the safety of students and parents. As such, the car park would not be visible from any nearby surrounding public vantage points. Its impact on the openness of the Green Belt would be minimal and be outweighed by the 'need' for this critical infrastructure that is necessary to help mitigate the impact of the proposals.

67. In withdrawing the original scheme (reference GR/21/316 and KCC/GR/0041/2021), the applicant had the opportunity to review a number of options to help address the concerns that were raised in respect of the earlier planning application. In considering earlier representations, the applicant determined that a new school car park would be required to enable parents to drive off Wrotham Road and be able to drop off and pick up children safely and conveniently. The applicant has confirmed that the proposed new car park has been located in the only viable location to provide this mitigating feature and would in turn improve the wider shared car parking area for the users of the adjoining medical surgery, library and nursery. However, taking into account the above, it is accepted that the new car park feature would have a greater impact on the openness of the site and by implication the Green Belt compared to the existing situation given the scale of the proposals. The proposals however seek to minimise or limit the 'impact' given:

    a) the position of the new building on the lower plateau of the school site;
    b) the proximity of surrounding buildings also within the Green Belt;
    c) being subservient to the existing school building;
    d) the screening afforded by boundary landscaping;
    e) being located on a part of the site that historically has been occupied by 2 and 3-storey buildings; and,
    f) adopting an architectural language that would complement and blend well with its landscape surroundings and backdrop.

68. In considering the planning application, the applicant has advised that the proposed development would encroach into the Green Belt, which may harm its openness. First, it is important to note that the site is well screened from public views by the mature boundary planting and screening. However, the openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case.

69. The applicant advises that the siting of the new school building has been carefully considered so as to minimise its impact on the openness of the Green Belt. As detailed above, the proposed building would be located on the area of the original school which was demolished and the new 3-storey school building rebuilt on a different part of the school site. The building would therefore be viewed against the backdrop of the existing school building and the other buildings located on this site. As such, I am satisfied that the siting of the development is the most appropriate location within the site in terms of limiting the impact of the proposed school building on the openness of the Green Belt.

70. With regard to the new car park and pupil drop-off/pick up area, as stated above I am satisfied that these elements of the scheme are proposed in the most logical and appropriate location. These elements of the development are a 2-dimensional engineering solution, located behind the existing medical centre and located in an area that is well screened from public vistas. As such I am satisfied that they would not have a significant detrimental impact on the openness of the Green Belt.

71. Whilst the development proposals would inevitably have some impact on the Green Belt, I consider that the new building and associated car parking would be well contained within the immediate context of the existing school site, and that the impact of the proposals on the openness and functioning of the Green Belt would be limited. It is also of note that most of the school grounds to the south and west would continue to remain

undeveloped or open in nature, reducing the overall impact of the development on the character of the site and its surroundings.

Summary – Very Special Circumstances/Green Belt Considerations

72. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the development plan policies and the NPPF. The development is inappropriate development for the purposes of Green Belt consideration and is, therefore, by definition harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'very special circumstances' capable of outweighing harm, in this particular case. Furthermore, I accept that the particular siting and design of the proposals has been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case. However, if Members were minded to grant permission, the application would need to be referred to the Secretary of State for Levelling Up, Housing and Communities and for his consideration before permission could be granted.

Design and Impact on Local Amenity

Siting and Layout

73. The distance between the existing Meopham School buildings' east elevation and the and the nearest residential elevation on the western side of the Wrotham Road is approximately 50m. The proposed development would not reduce this distance since the building would be positioned more centrally within the school site and further away from residential properties on both sides of Wrotham Road. Accordingly, the applicant has demonstrated that the separation distances between the proposed development and the nearest residential properties would be sufficient to avoid any significant adverse impact on local amenity. In addition, the level of existing boundary landscaping unaffected by the proposals would also help minimise impact on local amenity.

74. The 3D visuals that accompany this planning application demonstrate the proposal should not have any adverse impact on views from the east looking toward the application site. The new drop off / pick up car park facility would be located immediately south of the existing medical centre, and immediately west of an existing wooded area. This area of the site is not easily visible from outside of the school site, and this would continue to be case following development. Accordingly, it is considered that the proposed siting and layout of development satisfies the requirements of Core Strategy Policies CS01, CS10, and CS19 and NPPF objectives in relation to good design and impact on surrounding character.

Scale, Massing and Height

75. As already covered in paragraph 64 above, the proposed building would have a height that is lower than the existing school building. As noted, the building has been designed so that it would be sub-servient to the original school building in respect of its massing, height, and general appearance. Taking the above into account, in addition to earlier comments made regarding the impact on the openness of the Green Belt, the proposal is considered to be acceptable in scale and massing terms. The proposals would blend well with the existing site and ensure there is no loss of local amenity. The new building would be well screened on the Wrotham Road street scene, especially given the

separation distances and the amount of boundary landscaping retained and enhanced in the landscape strategy.

76. It is therefore considered that the proposed scale, massing, and height of the development satisfies the requirements of Core Strategy Policies CS01, CS10, CS19 and Strategic Objective S08, and NPPF objectives in relation to good design.

Appearance and Materials

77. The appearance of the buildings has been subject to a series of pre-application consultations with officers and local stakeholders. The applicant states that the material palette of the proposed development has been selected to blend well with the existing school site and to inject a fresh and modern look to enhance the appearance of the site. This is demonstrated in the accompanying Design and Access Statement, which states the form, scale and massing of the development has been designed to fit in well with the existing building on the site. The new block would have a secondary importance in comparison to the existing school. This would help the user to understand the use of the two buildings. The topography of the site would also help to minimise the impact of the new block on the existing environment.

78. The design has taken inspiration from the surrounding landscape. This has been emphasised by the use of horizontal volumes on the facade and slight difference in the colour palette for the cladding. The proposal seeks to reinterpret key features of the existing building, such as the coloured windows frame, in a different way. This creates a campus look providing a distinction between the two buildings. The proposed palette of materials is of high quality and would secure a natural aesthetic. Notably the facades for the school building reinterpret the look of the existing building on the site and it would improve the general aesthetic of the site.

79. Taking the above into account, considerable thought has gone into the selection of materials and the overall appearance of the proposed schools, with particular regard to how it can not only blend in with, but also complement, the wider character of the area. It is demonstrated that the proposed appearance and chosen materials for the development meets the requirements of Core Strategy Policies CS01, CS10, and CS19 and NPPF objectives in relation to good design.

Sport England – Impact on Playing Field

80. Having accepted the siting and design of the development with regard to impact on the openness of the Green Belt, the local landscape and the amenity of the locality, the siting of the proposed new car park and pupil drop-off/pick up area must also be considered in terms of the Sport England objection. The applicant has confirmed that the proposed development had been the subject of a pre-application consultation with Sport England. Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply see paragraph 33 above for the list of exceptions. Therefore, Sport England is of the view that the land required to accommodate the new car park and pupil drop off/pick up facility has been used for sport in the last 5 years. The applicant has however, stated that it is actually not the case.

81. The Headteacher has confirmed that this area of the school site has not been used for sport in the last 7 years, at least. He stated that this former area of the playing field is actually not suitable for sport purposes due to its condition. It has been confirmed that

the condition of the ground is so poor that it is a health and safety hazard for any type of activity. The School does not allow students or staff to use this part of the field at all due to the trip hazards. It is very uneven due to debris, soil and significant mole activity, and it is overgrown. The only facilities left on the field are a pair of goalposts which are rusted and in a state of disrepair. The School does not have the funds to fix this area of the school's playing field and therefore states that the condition would only deteriorate further.

Google image of Meopham School playing field taken in 2018 (image provided by Sport England).

82. Furthermore, the Headteacher has also confirmed that the space is not used by the school and is not required to provide sporting activities for the students. The Headteacher has stated that the School has a large playing field that they invest in to provide sports facilities, including grounds maintenance, line painting and more recently goal posts. The PE department has also confirmed that even with the increased intake of students there is sufficient outdoor and indoor space to fulfil the curriculum, enrichment opportunities, sports days and community events. The applicant considers that this area of the school site is now surplus to the educational requirements and is the ideal and feasible location to accommodate the new car park and pupil drop off/pick up facility which is required to mitigate the additional growth in pupil numbers at the school.

83. The school's operational playing field, which is to the west of the proposed new car park area, and west of the existing school buildings, would remain unaffected by the proposals. The School has confirmed that it has sufficient outdoor and indoor recreational space to meet the needs of an expanded school cohort. On this basis, the applicant considers that the proposal satisfies Exception text E3 of Sport England's planning policy and based on the above, the applicant considers that the principle of development should be supported in accordance with relevant planning policy.

84. However, Sport England in its response consider that the proposal is for an expansion of the school including the development of a new staff car park on part of the existing playing field. Sport England understand that the earlier application was withdrawn following objections from local residents regarding the potential of the new building to cause an increase in traffic visiting the school and that the current application is an attempt to resolve those concerns by providing additional parking on the school site.

85. Sport England state that the proposed new car park and pupil drop-off/pick up area would appear to be sited on an existing area of playing field that has been used for sport in the last 5 years based on a Google image from 2018, however this is disputed by the Headteacher who claims that this area of the playing field has not be used for at least the last 7 years. There is a difference of opinion as to the last date that this playing field was indeed used. The School does not dispute that this area of playing field had been used for sport but over the years it has become unsuitable for sport purposes due to its condition. The goal posts that can be seen in the Google image had not been taken down hence they are apparent in the Google image from May 2018 and suggest it was possibly in use at that time.

86. As outlined in paragraphs above, I accept the need for expansion of the school as part of the County Council's Basic Need Project, including the need for additional associated car parking and that this is located on an unusable part of the playing field. The area the proposed car park and pupil drop-off/pick up area would not affect the ability for the remaining section of this unused playing field to be able to be used again in the future for some recreational use (if the school ever decided to) and I consider the development as proposed represents the most suitable and practicable option for the site and should be balanced against the need for the development and wider benefits to the community of this education facility. It would be very difficult to accommodate the new car park and pupil drop-off/pick up area elsewhere within the school site without prejudicing other planning requirements and objectives such as retaining trees and maintaining the usable playing field to the west of the school site. Accordingly, I consider the development as proposed represents the most suitable and practicable option for the site and is not sufficient to outweigh the need for the development.

87. Should Members be minded to agree with the recommendation of this report and grant planning permission subject to conditions, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State for Levelling Up, Housing and Communities for his consideration.

Access, parking and highway matters

88. As can be seen from the representations summarised in paragraph 36 of this report and the consultation responses summarised in paragraph 33, specifically the views of Meopham Town Council and Mr Sweetland, the Local Member, this application has met with significant objection on the grounds of additional traffic, access, parking and general highway matters. It is considered by those that have raised objection that the local highway network, and the entrance and exit from the school site onto A227 Wrotham Road, cannot safely accommodate the additional traffic and parking associated with the proposed 2FE expansion of the school, that insufficient on-site parking is being proposed, and that the development as a whole would have a unacceptable impact on the existing highway network, exacerbating existing traffic and associated congestion, and parking both on the Wrotham Road and in surrounding residential roads.

89. Previously the applicant submitted a planning application for a 2 FE expansion to Meopham School in March 2021 (reference GR/21/316 and KCC/GR/0041/2021). That planning application attracted a number of representations from the local community as well as objection from Meopham Parish Council, and the Local Member and a holding objection from Kent Highways, with the focus of concern being the potential impact of the proposal on highways and parking. The applicant subsequently withdrew that planning application in June 2021, to enable the design team to review all of the feedback in detail and develop an improved proposal based on the feedback from the local community.

90. The applicant considers that the scheme now represents a substantially improved proposal which includes a new dedicated school car park area with a drop-off and pick-up facility that is proposed to significantly reduce the impact of the proposal on the local highway network. The proposed new building itself has not changed, but the application site area has increased to encompass the new car parking area involving land within the applicant's ownership.

91. Following withdrawal of the original application, the applicant has reviewed a number of options to help address the concerns that were raised previously regarding access and highway matters. The applicant considers that the proposed new car park is the only viable location to provide this mitigating feature and would in turn improve the wider shared car park area for users of the adjoining library, medical centre and nursery. The new pupil drop-off and pick-up facility would provide space for parents to park on-site, away from Wrotham Road and the local streets. Furthermore, the car park has been designed with a 'fast-track' drop-off lane for use in the mornings, and standard parking bays to allow parents to park up and wait at the end of the school day.

92. It is also proposed that the internal road layout would be upgraded to improve circulation of traffic and upon entering the site, the carriageway would be widened to two lanes to separate traffic using the new drop-off and pick-up facility and traffic accessing the library, medical centre, nursery and tennis and fitness centre. Priority would be given to traffic entering the site, with traffic exiting the new drop-off and pick-up facility being required to give-way. It is proposed to improve signage and road markings to clearly guide drivers through the site. A new bus only zone is also proposed to be created so that buses are separated from other traffic and do not block vehicles when they are stopped. All car parking currently situated in the proposed bus only zone would be relocated so no exiting parking would be lost.

93. As also proposed in the original application, a new staff car park would be provided close to the existing school building. A Car Park Management Plan has been created by specialist transport consultants to assist the School in managing the new access and parking arrangements, which the School has confirmed a commitment to enforce on school staff, children and parents. The Car Park Management Plan forms part of the School Travel Plan and the School has made a commitment to update both documents on an annual basis.

Traffic impact on A227 Wrotham Road, site access and on-street parking

94. Objection and concerns have been raised regarding the proposed extra traffic associated with the 2FE expansion. It has been suggested that additional traffic generated by this application would exacerbate existing difficulties and congestion at the junction of the A227. Further comments have been made that currently vehicles are unable to turn into the school site due to the congestion within the school site and which then results in vehicles not able to turn right out of the school site due to the queuing

traffic on the A227. Consequently, the whole of the school site internally can become gridlocked, and concern has been raised about the general safety of all road users.

95. Access to the school is achieved via a single access to the east of the site from Wrotham Road (A227), a well-lit A road which is subject to a 30mph speed limit. The access is approximately 6m wide and widens to 15m at the junction mouth. Wrotham Road varies in width from between 7m and 8m along its length. It provides links to both Gravesend to the north, and Borough Green and Wrotham to the south. There are no parking restrictions on the section of Wrotham Road adjacent to the site and there is a layby opposite the site access on the eastern side of the road where some drop-off/pick-up occurs. To the north of the site Wrotham Road provides a link to the A2, where the A2 can be used to join both the M25 at junction 2 and M2 at junction 1.

96. The single access to the site is shared by all the different land uses on the site. There is a one-way system in place for access to the medical centre, nursey, library and school, which leads to the unmarked parking areas for all the mentioned uses. The applicant has confirmed that the one-way route is clearly signposted leading around a kerbed grassed area with trees serving as an irregularly shaped roundabout on the site. There is a separate route following a right turn from the access that leads to the tennis and fitness centre. The current access to the site is to remain as per the existing arrangement off Wrotham Road, however changes are proposed to the internal access and egress arrangements within the site (discussed further below).

97. Within the accompanying Transport Statement, a 'hands up' survey of pupils was undertaken in October 2021 as part of the School Travel Plan survey which showed that the main transport mode for pupils is by car (43% with a further 9% parking nearby and walking). 25% of pupils travelled to school by bus, 12% walked to school and [less than] 1% cycled. The high proportions of pupils travelling by bus/car was attributed to the rural nature of the school and wide catchment area which includes Gravesend. It was also confirmed that the majority of staff drive to/from the school (93%).

98. The Transport Statement concluded that the proposed 2FE expansion would attract an additional 196 pupils travelling to the school by car in the AM Peak compared to the the Planning Baseline and an increase of 136 pupils travelling by car, compared to the existing situation. In the PM peak the proposed expanded school would generate an increase of 256 pupils travelling by car compared the Planning Baseline and an increase of 136 pupils travelling by car compared to the existing situation. The traffic impact assessment demonstrates that in the AM peak hour, there would be a 16% increase in trips on the Wrotham Road north arm and 12% increase on the Wrotham Road south arm in a 2026 + Development scenario, compared to the 2026 planning baseline scenario. In the PM peak, there would be a 13% increase in trips on the Wrotham Road north arm and a 12% increase in trips on the Wrotham Road south arm. It should be noted that some of the pupils currently car share with a friend and this number is likely to rise and some pupils have a sibling already attending the school, so it should be noted that the pupil numbers quoted above are worst case scenario.

99. Traffic and parking surveys were undertaken by the Transport Consultant which concluded that during the AM peak, most pupils were dropped-off on site and so there was a quick turnover of vehicles. In the PM peak however, most pupils were picked up off-site with parents parking mainly on Wrotham Road, Meadfield Road, Cheyne Walk and Shipley Hills Road. It was also noted that there was a slower turnover of vehicles due to parents parking up and waiting for their children to leave the school. This parking was noted to have started from about 14:30hrs and went on until 15:15hrs, which is the time that the school day finishes, before most vehicles started to depart. It has been

assumed that this trend would continue and that some parents would continue to choose to park off-site.

100. On-street parking in the local area is mostly unrestricted, excluding a section of double yellow lines on both sides of the carriageway from the bus stops to the north of the school on Wrotham Road, northbound to its junction with The Street and protection at local junctions. The Transport Consultant has carried out a series of parking surveys in both the morning drop off and afternoon pick up within a 400m walk of the school site. The Transport Consultant noted that these surveys were undertaken at a time when the UK government was advising people to work from home if they could due to the COVID-19 pandemic. Therefore, the level of on-street parking observed could be higher than during pre-pandemic conditions and the findings are considered to present a robust scenario.

101. The utilisation of on-street parking in the AM drop-off period was observed to be fairly consistent across the study period, with the highest number of parked cars observed at 08:10am with 37 vehicles parked and 98 spaces. However, given that the school day starts at 08:40am, this was likely to be attributable to residents rather than parked cars associated with the school. However, the utilisation of on-street parking in the PM pick-up showed that the highest level of on-street parking to be observed at 15:05pm (the finishing time of the school) with a total of 91 vehicles parked in the study area. At the end of the school day, most pupils were collected off-site with parents parking on Wrotham Road, Meadfield Road, Cheyne Walk and Shipley Hills Road. It was also noted that during the parking survey period, that about 10 of the vehicles parked at this time were in areas deemed unsuitable for parking such as in bus stop laybys or on double yellow lines.

102. Kent Highways requested that the applicant open up a dialogue with Gravesham Borough Council (GBC) Parking Manager, as the appropriate parking enforcement authority to discuss the on-going parking issues around the school site and the inconsiderate parking by some parents. Following these discussions, the GBC Parking Manager considered that there were already adequate parking restrictions on Wrotham Road and did not consider that any on-street parking restrictions on the residential roads were appropriate. He also stated that any highway safety related restrictions were the responsibility of the Highway Authority (Kent County Council) and any obstructions or inappropriate parking were the responsibility of the Police. Furthermore, the GBC Parking Manager confirmed that the school should regularly liaise with him regarding any known problems but should contact the police for any cases of obstruction.

103. Further to the requested discussions with GBC Parking Manager, Kent Highways have requested that the school communicates with parents regarding the impact on local residents of inappropriate parking and liaises fully with the Parking Manager. Kent Highways have otherwise confirmed that their concerns on this issue have been fully investigated and accepted that there is nothing further to be considered regarding the parental parking in the residential roads surrounding the school.

104. It is acknowledged from the parking survey that was carried out by the Transport Consultant that parents do generally drop off their children on the school site for the start of school but during the afternoon pick up, most parents do park on the surrounding residential roads as they find it quicker to leave once school has finished. Although it is acknowledged that this may cause a problem for some local residents with some inconsiderate parking, generally the parents are not parked up for a long period of time and they remain in their vehicles and so could move their vehicles, if needed. Also there would be an element of on-street parking around any school at the start and the end of

the school day which is to be expected and so there is very little that can be done from preventing vehicles from parking on the public highway.

105. In this particular instance, the School has agreed to join the Secondary School – Responsible Parking Initiative as an Action in their School Travel Plan, and to hold an annual meeting with local residents to discuss parking matters. The School is also proposing to set up a car sharing database for both parents and staff as a way of reducing vehicle trips to and from the school, but also as a way of reducing the number of parents parking on the surrounding residential streets as a result. Whilst the School is unable to prevent parents from lawfully parking in the surrounding roads, the School is mindful of the proposed increase in traffic movements that the 2FE expansion would bring and therefore mitigation measures are proposed as part of this planning application by providing an 81 space on-site car park for parents which also includes a pupil drop-off/pick area for up to 14 vehicles. In total this facility would provide enough parking spaces and pupil drop-off/pick up spaces for up to 95 vehicles at any one time plus there is extra capacity within the access road leading to the car park and within the actual aisles for more vehicles to be waiting to park or to drop off or collect pupils. The school is also proposing to implement an information and publicity campaign to parents promoting use of the new drop-off/pick-up facility on site and further discouraging on-street drop-off/pick-up.

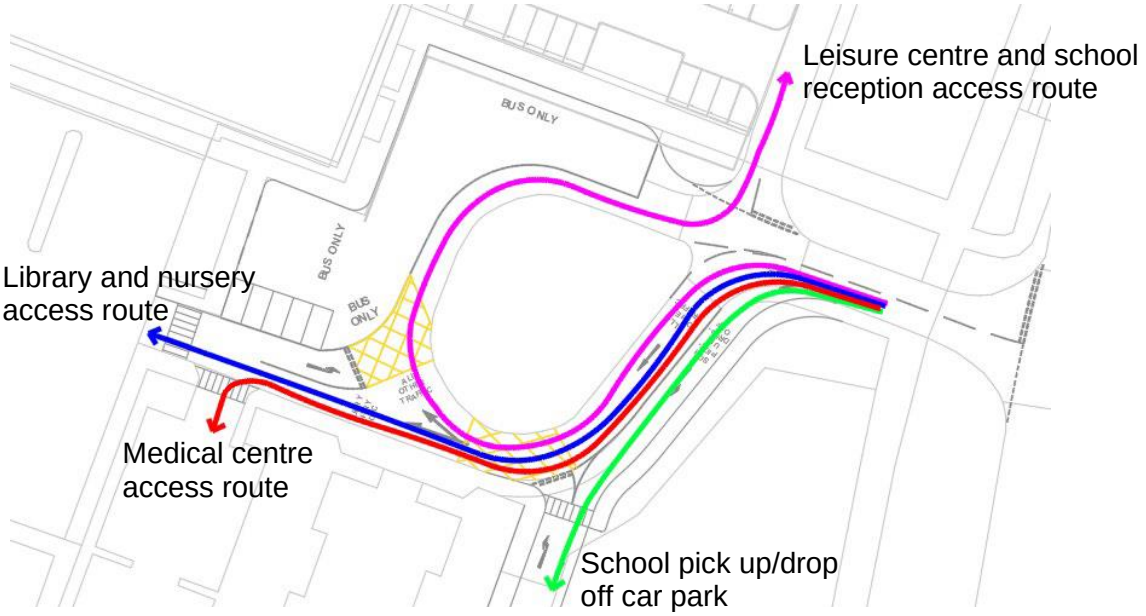
106. I am mindful that the School is proposing to provide a new on-site car park for parents and a pupil drop-off/pick up facility, as well as internal site access and circulation improvements. In addition, as part of the School Travel Plan, the School would promote, encourage and monitor the use of this car park as a way of reducing parking in the surrounding residential roads and that this would be annually reviewed. Funding and a commitment to this review would be part of the required Memorandum Of Understanding (MOU) between the Council's Children, Young People and Education (CYPE) and Highways Transportation & Waste (HTW) Directorates. On this basis, Kent Highways have considered the planning application and have raised no objection on parking grounds. Subject to the imposition of conditions and the MOU requested by Kent Highway, I do not consider that the proposed development would have a significantly detrimental impact on the highway network with regard to off-site car parking and therefore see no reason to refuse the application on this ground.

<u>Congestion on the A227, on-site parking and internal alterations to the road layout</u>

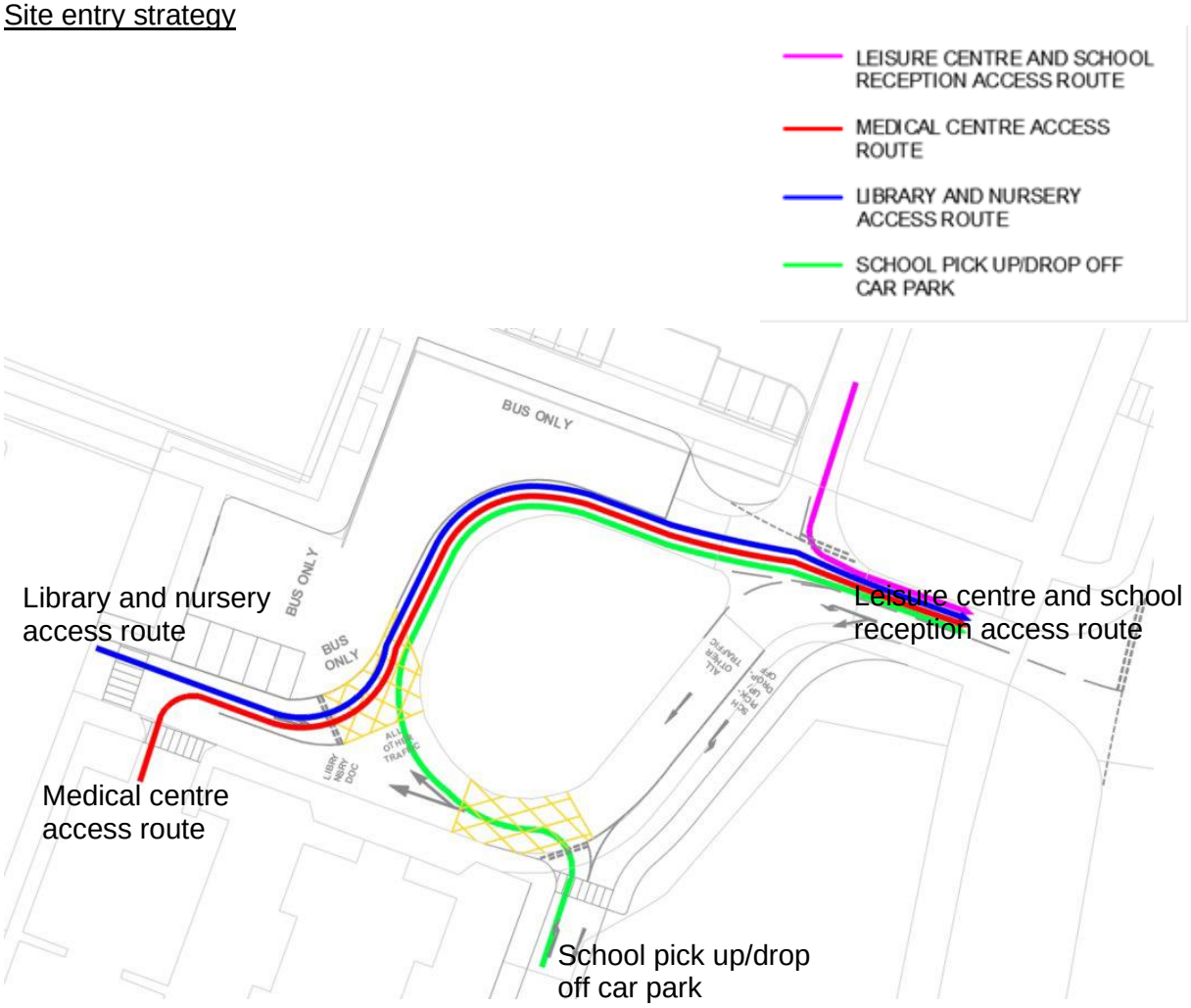
107. Concern has been raised due to vehicles queuing to enter and leave the school site and that this causes congestion on both the northbound and southbound sides of the A227 Wrotham Road. There is a single access to serve all the users of the site and currently there is gridlock within the site at the end of the school day as vehicles try to enter or leave the site and end up blocking each other as no one is able to move.

108. The applicant has confirmed that currently, during the peak drop-off and pick-up times, school traffic can block access to the other facilities on the site and queueing traffic can block back to the site access junction. As a proposed mitigation measure, the internal road layout would be upgraded to improve circulation of traffic within the site and to separate the pupil drop-off/pick-up traffic from traffic associated with other facilities. Upon entering the site, the carriageway would split into two lanes and all traffic would be required to circulate around the internal 'roundabout' to exit the site. The left lane would lead to the new pupil drop-off/pick-up car park and the right lane is to be used by all other traffic entering the site (including buses). Traffic would no longer be able to turn immediately right upon entering the site to access the fitness and tennis centre, as this is proposed to reduce conflict near the site access and the likelihood of traffic backing up

as vehicles wait to turn within the site. The future access routes for visitors to each facility is shown in the drawings and key table below.



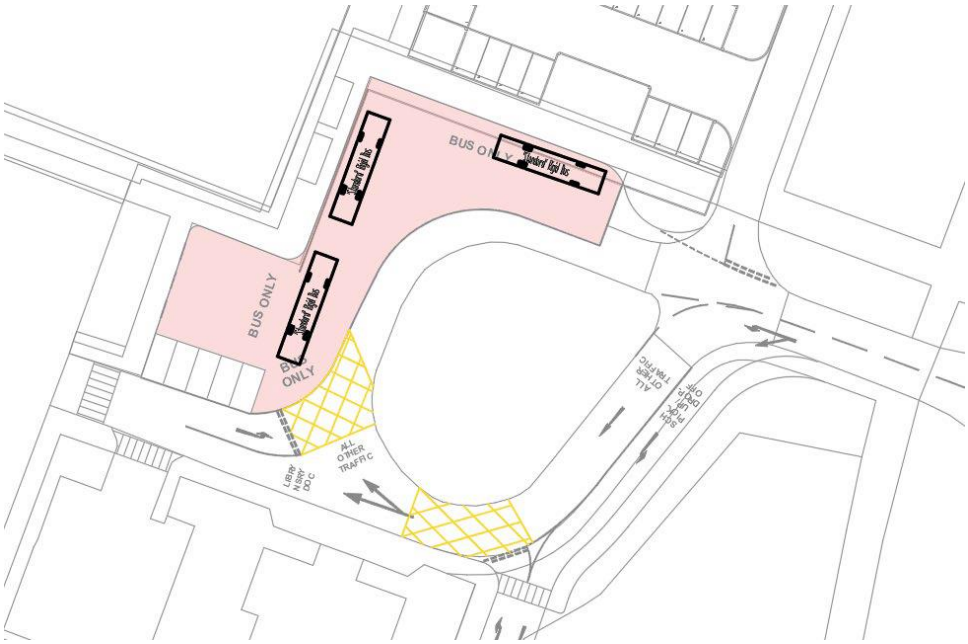
Site entry strategy



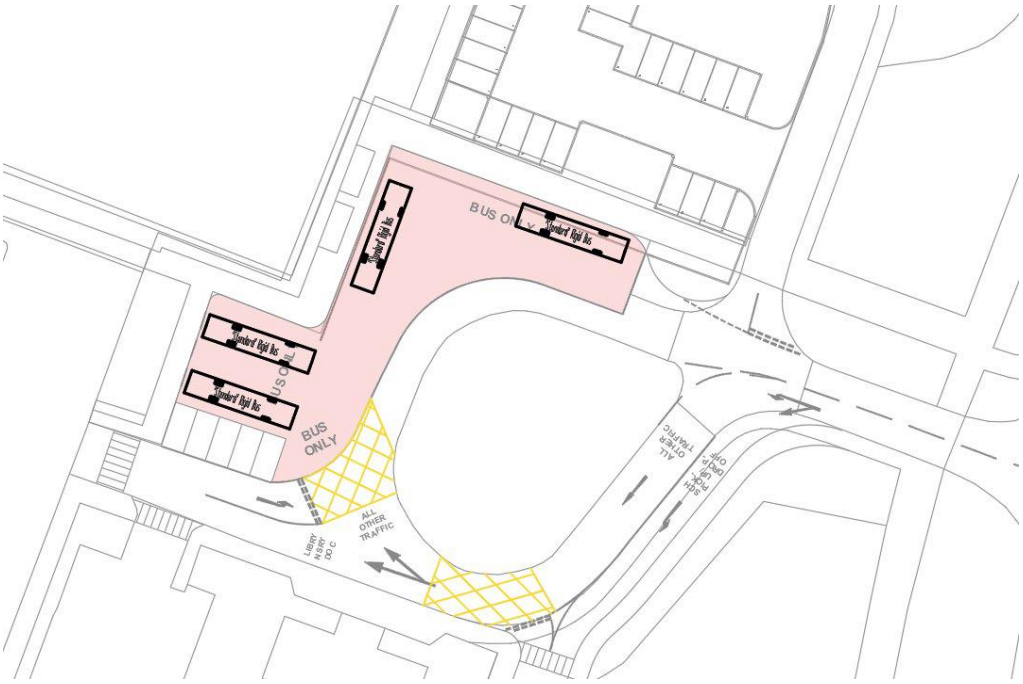
Site exit strategy

109. It is proposed that the on-site traffic signage would be updated to reflect the new access strategy. Lane markings would also be provided clearly indicating to drivers their direction of travel within the site. All users would continue to exit the site via the existing Wrotham Road junction. Vehicles travelling around the internal 'roundabout' would merge with the bus lane within the site so that all vehicles would use one lane to exit the site. Vehicles from the fitness and tennis centre and staff parking area to the north would continue to use the junction onto the access road to exit which would be onto the one lane merge. Vehicles from the fitness centre and staff parking area would also be able to travel straight ahead to enable staff to access other spaces on site should the car park near the school entrance be full.

110. To help buses to be able to turn around within the site without blocking the internal traffic, a bus only zone is proposed to be created adjacent to the internal roundabout. The bus zone would be clearly demarcated and has been designed so that in the AM peak, 3 buses would be able to park up concurrently and depart independent of each other, whilst in the PM peak the bus only zone has been designed so that 4 buses would be able to park concurrently, with 2 buses reversing into position before the end of the school day (as occurs currently).



Configuration of the bus zone in the AM peak



Configuration of the bus zone in the PM peak

111. The creation of the proposed bus only zone would result in the removal of 15 parking spaces, however these would be relocated to the proposed pupil drop-off/ pick-up car park so that no parking would be lost. It is anticipated that the new bus only zone would significantly improve safety for pupils boarding and alighting buses by providing them with a dedicated area. The dedicated area would mean that buses would no longer block other traffic on the internal roundabout which site observations have shown can cause blocking back to the site access on Wrotham Road. It is anticipated that this arrangement would also improve the operation of the site access during peak drop-off/ pick-up times.

112. To accommodate the increase in staff, an additional 42 parking spaces (1 per staff member) are proposed to be provided for staff. The parking currently on site is shared between all uses of the site, however the new parking area would be for use by the school only. The School Travel Plan suggests that 93% of staff travel to the school by car. On this basis, the proposed level of provision is deemed sufficient to accommodate the parking demand arising from the additional 42 members of staff. 32 of the proposed parking spaces would be located adjacent and connected to the existing 6 disabled bays near the main school building. Access to 7 additional parking spaces would be provided via the internal access road to the tennis and fitness centre and the remaining 3 bays would be provided in the new pupil drop-off/pick-up car park, alongside relocated staff parking as a result of a proposed bus only zone within the site. 5 accessible parking bays are currently provided in a small 6-space parking area adjacent to the school entrance which are retained in this location. 4 accessible bays are also currently present in the location of the future bus only area and it is proposed that these would be relocated into the new staff car park. The School advises that no sixth formers drive to the site and on this basis no parking for sixth formers has been provided, but I recommend that this is monitored annually as part of The Car Park Management Plan review.

113. The applicant has confirmed that currently drop-off predominantly occurs within the site on the internal roundabout in the AM peak and offsite in the PM peak. To accommodate

the additional pupils from the expansion, a new pupil drop-off/ pick up car park is proposed to be provided on land to the south of the medical centre (shown below). Entry to this new car park would be via a short access road along the eastern boundary of the medical centre. The proposed car park would have a total of 99 parking spaces of which 18 parking spaces would be for staff (comprising of 3 new bays and 15 bays relocated from the location of the proposed bus only zone) and a total of 95 spaces for parents to park. (81 parking spaces and 14 spaces within the pupil drop-off/pick up area). The new drop-off/ pick up car park would also be able to accommodate any increase in demand from visitors to the school site during the day, as well as providing a parking area for visitors during special events at the school such as parents evenings.

114. The applicant has confirmed that to accommodate the additional pupils, a new dedicated drop-off pick-up facility would be provided which would benefit all users of this site and the surrounding area. It is anticipated that these proposed improvements would help discourage parents from parking away from the school site, and instead use the new safe and conveniently located new car park. It would also help discourage parents from using the parking bays in front of the medical centre, nursery and library, which in turn would improve access to these facilities during school pick-up/drop-off times. Configuring the drop off/pick up area to give way to incoming traffic from the users of the other facilities on site is also proposed to provide a betterment. A Car Park Management Plan has been prepared to ensure the successful operation of the new car park and parking arrangements and to which the school has a confirmed commitment to enforce this management plan on school staff, children and parents. The Car Park Management Plan forms part of the School Travel Plan and the School has made a commitment to update both documents on an annual basis.

115. The applicant has provided mitigation measures to provide an on-site car park to cater for both the proposed increase in staff numbers and to accommodate the proposed increase in pupils and the associated increased traffic movements. The internal access road has been re-designed so that the traffic flow is improved within the site and so that it is easier and more appealing for parents to drive onto the school site, particularly

during the afternoon pick up, and to collect their children. A bus only zone is also proposed to separate the buses from parked cars and traffic and to encourage more pupils to use the bus (to be discussed below) as their means of getting to and from school. Due to the proposed improvements within the school site and the anticipated improvements to the circulation within the school site, this should also reduce the congestion at the access point on the A227.

116. Kent Highways have been consulted on these proposals and have raised no objection to these proposed mitigation measures as mentioned above. I also consider that the proposals satisfies the requirements of the Core Strategy Policies CS01, CS10, CS11, CS19, and associated guidance with the NPPF. I would not therefore raise a planning objection on this matter.

Bus Service Improvements

117. There is local objection to the number of pupils that are driven to this school and the subsequent increase in traffic, parking and pollution that results and that Meopham School is being expanded to provide additional school places for children from other parts of Gravesham Borough to the detriment of local residents.

118. As referred to above, the Kent Commissioning Plan 2019-2024 has identified a deficit of secondary school places within the Gravesend and Longfield Non-Selective Planning Group. There are currently seven secondary schools within the Planning Group, of which six schools have either already expanded or are the subject of a proposal to expand. The Local Education Authority, who have a statutory duty to provide school places, have confirmed that Meopham School is the only remaining option for expansion.

119. The accompanying Transport Assessment and School Travel Plan data for July 2021 indicated that about a quarter of all school pupils travelled to this school site by bus, which is relatively low for a secondary school. When pupils were again surveyed in March 2022 to find out how they travelled to school, the percentage of pupils travelling to school bus went up slightly from 24.6% to 32.3%, and just 151 pupils at this school have a Freedom Bus Pass. As part of the assessment of the application, Kent Highways requested further consultations to take place with KCC Public Transport as the requested improvements to bus services had not been fully addressed following comments it made in previous holding objections.

120. A specialist third party survey company was commissioned by the applicant to undertake a bus usage/capacity survey at the school. A summary of the bus usage survey is provided below;

AM Peak Hour:
- 7 buses entered the site to drop off pupils.
- 6 out of the 7 buses had spare capacity. For 4 of the buses, the percentage occupancy was 60% or less.
- 1 bus stopped adjacent to the site on A227. This bus was 50% occupied on arrival. No pupils alighted at the stop.
- 166 seats (or 48%) were unoccupied during the AM peak hour on arrival at the site.

PM Peak Hour:
- 6 buses entered the site to pick up pupils.
- 5 out of the 6 buses had spare capacity. For 3 of the buses, the percentage occupancy was 60% or less.

- 2 buses stopped adjacent to the site on A227, one of which subsequently entered the school to pick up pupils. The other bus was 100% occupied on departure.
- 92 seats (or 43%) were unoccupied during the PM peak hour on departure from the site.

121. The survey demonstrated that there was sufficient spare capacity in the existing buses stopping within the school site to accommodate the predicted additional demand for bus travel arising from the proposed expansion. However it was not possible to forecast any wider travel demand that there may be beyond capacity on existing routes, such as future student demand from areas where existing bus services do not currently serve. The survey of the existing bus service catchment area concluded that there was generally good bus service coverage of the densest student home postcode locations, albeit there appeared to be a service gap in the south-east of Gravesend urban area, in the area east of Wrotham Road, south of A226 Gravesend Road and north of A2 Watling Street.

122. Whilst no specific reason could be given to the relatively low uptake of pupil using public transport to this school site, Kent Highways were keen to promote the usage of public transport as a means of reducing car trips to this school site as a result of the proposed expansion. This is to be met through monetary contributions from the Local Education Authority secured via a Memorandum of Understanding (MOU). Kent County Council's Public Transport Team have confirmed that the current status of the commercial bus network and KCC's own position on its subsidised routes, means that future pressures on providing new or additional bus services arising from the school expansion would need to be met, through contributions from the Education Authority. This would be achieved via the proposed Memorandum Of Understanding

123. The policy basis for the MoU is KCC's 'Guidance on Securing, Monitoring and Enforcing Travel Plans in Kent (April 2012)' which sets out a mechanism for KCC to seek and secure monitoring funding for developments in traffic sensitive areas and where a significant mode shift is anticipated by the introduction of a Travel Plan and the consequent reduction in car trips effectively mitigates the development impact. If the monitoring of the School Travel Plan indicates that there would be bus capacity issues or car mode share would exceed the targets set out in the School Travel Plan, the Education Authority would agree to make additional payments to provide for additional bus capacity or other sustainable transport mitigation measures.

124. The applicant is therefore proposing mitigation to aid in reducing the impact of the proposed expansion on Meopham Village and the surrounding roads. A contribution of a maximum of £250,000 (the maximum sum payable per annum shall not exceed £50,000 for a maximum of 5 years) for public transport improvements to the school, should they be required. This sum of up to £50,000 per year is based on the cost of providing one bus service to the school throughout one school year. Additionally a £5,000 contribution to School Travel Plan monitoring and review is also being provided over a 5 year period. This review would take place annually by the School through the monitoring of the School Travel Plan and the details of this review being submitted to KCC's Travel Plan Monitoring Officer. This contribution has been agreed with the Education Authority through negotiations as a result of the consultations on this application. The payment would be secured via a Memorandum of Understanding as opposed to a legal agreement as the County Council cannot enter into a legal agreement with itself. A draft MOU has been received and should permission be granted for the development, that Memorandum of Understanding would form part of the application documentation.

125. Kent Highways have been consulted on these proposals to address public transport improvements and have raised no objection to these proposed mitigation measures. I also consider that the proposals satisfies the requirements of the Local Plan's Core Strategy Policies CS11 and CS19, and associated guidance with the NPPF. I would not therefore raise a planning objection on this matter.

Further Highway Mitigation Measures

Car Park Management Plan

126. To ensure the successful operation of the car park, the School has agreed to implement a Car Park Management Plan comprising of a mixture of measures involving the education of students, provision of information to parents/visitors and patrolling of the car park by school staff during peak times. At the opening of the new drop-off/ pick-up car park, the School would implement additional measures to help guide parents in the use of the new facility and embed the new operational procedures of the car park. The Car Park Management Plan is provided within the planning application and has been incorporated within the School Travel Plan, so that both documents can be reviewed annually, and any changes and improvements made accordingly.

School Travel Plan

127. A School Travel Plan can be an effective mechanism to develop, implement and promote a bespoke package of initiatives designed around a specific school site and the 'users' travelling to and from the site. School Travel Plans include targets that aim to increase the proportion of journeys made by more sustainable modes to mitigate the impact of car-based trips, to promote active travel, reduce emissions and improve road safety. Importantly School Travel Plans operate on an ongoing basis with regular reviews and updates to ensure targets are being met.

128. The School would continue to encourage pupils to travel to and from the school site using modes other than the car. The School Travel Plan is a live document that would be required to be updated annually, as part of the agreed Memorandum Of Understanding (MOU) and be monitored by the Kent County Council Travel Plan Monitoring Officer. It is envisaged that this extra level of scrutiny would give the School Travel Plan more weight and greater confidence that the targets would be delivered as well as ensuring that the School Travel Plan would be an effective mitigation measure.

129. The annual monitoring would provide updated information about the pupils and where they live (through postcode information) and how they travelled to and from school. It would inform the School if the measures within the School Travel Plan's Action Plan were encouraging more pupils to either use the bus to school, car share, or walk and cycle to school. This information would also show if the existing bus services and bus routes were serving the areas where the pupils lived, or if there was a requirement to look at providing a new bus service to an area that currently was not served by a bus service. Then the proposed mitigation measures agreed in the MOU for improved bus service provision would be triggered to secure this new bus service.

Electric Vehicle Charging

130. A total of 4 parking bays within the new staff car park are proposed be provided with electric vehicle charging points. A further 8 parking bays are proposed to be provided with EV passive charging provision (ducting/cabling etc.), to allow conversion to charging bays in the future. This figure of 8 above, is based on the 42 proposed new staff parking

spaces. This amount of requested EV charging points is based on the emerging policy of 10% active and 20% passive applied to the uplift in staff parking.

Cycle Parking

131. Currently the school does not have any cycle parking onsite and this is also reflected in the data in the School Travel Plan which confirms that currently less than 1% of pupils cycle to school and currently no staff cycle. However, 4% of pupils have identified cycling as their preferred mode of travel to and from school. As part of this application site, it is proposing to provide 20 cycle stands adjacent to the main entrance of the existing 3-storey building and an area would be safeguarded on the site to allow for the future addition of further cycle parking, if required. Usage and demand for additional cycle parking would be monitored through the annual review of the Action Plan in the School Travel Plan.

Summary – Access, Parking and Highway Considerations

132. The 2FE expansion of the School would give rise to an increase in highway movements in the vicinity of the site. I also recognise that some of the expansion and the highway impact of this growth in the locality has taken place or can take place this September due to the Permitted Development Rights that are afforded to the School site. To facilitate the full 2FE expansion, considerable negotiations have taken place to mitigate the impact of the increase in pupil numbers and a number of mitigation measures are proposed. These include the introduction of a new and dedicated parent car park and pupil drop-off/pick up area, the internal access improvements for all users of the site, improvements and the creation of a bus only zone, annual monitoring of both the School Travel Plan and Car Park Management Plan and the encouragement of the use of more sustainable modes of transport, monitoring of bus usage at the school with the potential to provide additional bus services to the school site. Collectively and effectively these would mitigate the impact of the proposed 2FE expansion upon the highway network. Subject to the imposition of conditions and the financial contribution towards bus provision and monitoring, I do not consider that the proposed development would have a significantly detrimental impact on the highway network or highway safety. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. I therefore see no reason the refuse the application on highway grounds

Ecology and Landscaping

133. The accompanying Preliminary Ecological Appraisal (PEA) identifies that the north area of the site, where the new building is proposed to be located, has low to medium potential to support species. The appraisal does not make any recommendations for further detailed surveys in this area, although it does state that the removal of any trees or hedgerows with potential to attract breeding birds is carried out outside of the bird nesting season. In the southern part of the site, where the new drop off / pick up feature is to be located, was assessed as having potential to support protected and notable species. Recommendations have been made to reduce the proposed development impacts on wildlife to ensure compliance with planning policy. The recommendations are detailed within the PEA report.

134. The County Council's Biodiversity Officer has assessed this additional supporting information and is satisfied that the proposed development would not have an adverse impact on protected species, subject to the imposition of conditions. Prior to and during

construction a precautionary mitigation approach has been recommended for dormouse, badgers and breeding birds as set out within the Preliminary Ecological Appraisal document. Also prior to and during construction works, the habitat creation and reptile mitigation works within the Additional Ecological Assessment would be implemented as detailed and upon completion of the reptile mitigation works the grassland would be managed as detailed in the Proposed Enhancement and Mitigation Plan. Furthermore, a signed Impact Assessment and Conservation Payment Certificate signed by Natural England would be submitted to the County Planning Authority for written approval. No works would commence on site until the applicant has received the full District Level Licence. Finally, heras fencing is required to be erected around the retained reptile habitat and this needs to be included with the Construction Management Plan. Subject to the imposition of the condition outlined above, I am satisfied that the development would not have a detrimental impact upon protected species and/or their habitats.

135. The accompanying Arboricultural Report and Impact Assessment assesses the proposal to construct the new car park access road and the new car park behind the medical centre. As part of the landscaping works it is proposed to retain all Category A (trees of high quality with an estimated remaining life expectancy of at least 40 years) on this site. However, there is a need to remove 5no. Category B trees, 7no. Category C trees, and 1no. Category U tree. To mitigate the loss of trees and maintain levels of amenity and biodiversity, the applicant is proposing to plant new trees to the south and west of the proposed new pupil drop off/pick up car park area, so that there should be no net loss of trees and landscaping features across the site as a result of the proposed development. The implementation of the proposed landscaping scheme can be covered by condition.

External lighting

136. To ensure that the proposed new external lighting is appropriate for this site, details would be reserved by condition so that the type and position of any external lighting, including lighting of the buildings for security and wayfinding, and lighting of the car parking and access areas, can be controlled to ensure any potential nuisance from light pollution can be minimised. Details including the proposed time and days of operation and details of the timer and light sensors to be installed is requested. The lighting details should adhere to the Bat Conservation Trusts Bats and Lighting in the UK guidance and this can be addressed by condition.

Archaeology

137. The County Archaeologist has confirmed that the site lies within an area of archaeological potential and in particular for evidence of later prehistoric and Romano-British settlement. Evidence for this activity was recorded to the immediate north of the present development site and the potential is clearly set out in an archaeological desk-based assessment by Canterbury Archaeological Trust (Sevenoaks Environmental Consultancy Ltd.) submitted with the application. The County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, a condition of consent should be imposed. It is requested that no development takes place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable. I consider that the suggested condition would be an appropriate requirement in ensuring an acceptable level of evaluation and mitigation of the archaeological potential of the site. Therefore, subject to the imposition of the required condition, I do not consider that this proposal would have a detrimental impact on archaeological remains.

Drainage and Land Contamination

138. The Environment Agency and the County Council's Flood Risk Team (SuDs) both raise no objection to this application subject to the imposition of conditions. The Flood Risk Team require the submission of a detailed Sustainable Surface Water Drainage Scheme and the further submission of details of the implementation, maintenance and management of the sustainable drainage scheme. Should permission be granted, the conditions as outlined above would be imposed upon the consent to ensure that drainage of the site was both sustainable and effective.

139. With regard to land contamination, the Environment Agency requests a condition be attached to any consent regarding how works should proceed should any contamination be found during construction. Therefore, should permission be granted conditions would be imposed addressing this matter.

Construction

140. Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of construction to protect residential amenity. I recommend that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays.

141. I also consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of the development. That should include details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid peak school times, and details of any construction accesses. Such a strategy would also address the pre-commencement condition required by Kent Highways with regard to the construction of the development. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.

Sustainability

142. The applicant has confirmed that Meopham School was designed based on Department for Education (DfE) Output Specifications for May 2019. The energy approach adopted has been to adopt a fabric first approach whereby the thermal envelope of the building is enhanced to improve the overall energy efficiency of the building. The passive design measures are mentioned below. The scheme has been designed to improve upon Part L of the Building Regulations to increase the thermal insulation. The detailed design is to achieve an air permeability level of $5m^3/m^2/hrs$ to limit the heat loss through walls, floors, roof, windows and doors.

143. Furthermore, by maximising the window sizes, the applicant states to have effectively optimised the natural daylight into the spaces to limit the amount of artificial light and reduce the consumption of electricity. The scheme also uses natural ventilation to avoid the use of mechanical cooling; with the use of blinds to provide solar shade in the summer. The structural frame is to use Innovare SIP's (Structural Insulated Panels) system which uses sustainably sourced and certified timber. The SIPS system uses offsite production, which significantly reduces embodied CO^2 relating to transportation and less wastage.

144. The thermal mass of the concrete at first floor and the roof would passively help heat and cool the building by using the concrete to absorb, store and release, giving night cooling. In the future, when the building is at the end of its life the concrete can be recycled. Additionally, an array of Photovoltaic (PV) panels are proposed to be installed on the flat roof to provide the school with energy generation for reducing their environmental impact. Originally, these panels were to be provided as a future phase of development, but as a result of negotiations through the assessment of this application, the applicant has confirmed that they would now be provided as part of the expansion works. There are also allocated electrical vehicular charging bays for the school's use and infrastructure for expanding the number of charging points.

145. Finally, Galliford Try site management would promote the following measures to reduce carbon emissions during the construction phase:

1. Use solar panel floodlights
2. Switch off heaters and electrical equipment when office is not occupied
3. Minimise wastage with correct storage and order the sufficient amount of material
4. Stop machinery idling
5. Attend meetings by video link to minimise travel
6. All supply chain engaged would use timber materials that are sustainably sourced and timber certified

Conclusion

146. This proposal seeks planning permission as part of the Education Authority's Basic Need Programme for a 2 Form of Entry (2FE) expansion of the Meopham School, a non-selective secondary school in Gravesham Borough. It proposes the construction of a freestanding 2-storey teaching block to provide additional dedicated teaching and learning spaces, general and specialised teaching spaces and supporting facilities in addition to a music classroom, drama and dance studio and a main hall. The proposal also includes the provision of an additional 42 car parking spaces for staff, a school only car park including 4 accessible parking spaces and 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion and a further 99 space car park and pupil drop off/pick up area, along with the widening to 2 lanes of the internal access road, and the creation of a bus only zone to separate buses from other traffic.

147. This proposal has given rise to a variety of planning considerations, including the need for very special circumstances to be demonstrated to justify inappropriate development in the Green Belt, and the impact of the development on the highway network, traffic and parking, design and the impact upon local amenity and biodiversity and an objection from Sport England. I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy constraints. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions and the MOU outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network or highway safety, the amenity of local residents, nor biodiversity or sport interests. It is an appropriate design and would provide permanent purpose built accommodation for pupils. The proposal would accord with the principles of sustainable development as set out in the NPPF and Development Plan policy. The development would satisfy a recognised need for non-selective secondary school places in the Gravesham Borough area. There is very strong support for the provision of school places within the NPPF, the Planning Policy Statement for Schools and local planning

policy and this planning consideration should be afforded significant weight in determining this proposal. Therefore, subject to securing the funding commitment in the MOU towards public transport provision and the Action Plan in the School Travel Plan and the imposition of conditions, I am satisfied that the proposed development would not give rise to overriding material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the NPPF.

148. Therefore, I recommend that the application be referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that subject to his decision, and the completion of the Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan monitoring and Public Transport Capacity Improvements, permission be granted subject to conditions.

Recommendation

149. I RECOMMEND that the application BE REFERRED to the Secretary of State for Levelling Up, Housing and Communities as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that SUBJECT TO his decision, and SUBJECT TO the completion of a Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan monitoring and Public Transport Capacity Improvements that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

1. The standard 3 year time limit;
2. The development carried out in accordance with the permitted details;
3. The development to be carried out using external materials and colour finishes as specified within the planning application documents, unless otherwise agreed;
4. The submission and approval of the details of the Photovoltaic PV panels and any roof plant.
5. Details of external lighting, including times and days of operation and details of the timer and light sensor to be installed;
6. Any lighting proposals shall follow the recommendations within the Bats and Artificial Lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals;
7. Prior to and during construction works the precautionary mitigation for dormouse, badgers and breeding birds within the Preliminary Ecological Appraisal (Sevenoaks Environmental Consultancy. April 2021) shall be implemented as detailed;
8. Prior to and during construction works the habitat creation and reptile mitigation works within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;
9. On completion of the reptile mitigation works detailed in condition 7 (above) the grasslands must be managed as detailed in the Proposed Enhancement and Mitigation Plan within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;
10. An Impact Assessment and Conservation Payment Certificate signed by Natural England shall be submitted to the County Planning Authority for written approval. No works can commence on site until the applicant has received the full District Level Licence;
11. Measures to protect the existing trees during construction;
12. The implementation and maintenance of the Landscaping Scheme,
13. No tree removal during the bird breeding season;

14. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of 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 County Planning Authority and 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 County Planning Authority;
15. No development shall take place until a Construction Management Plan, including lorry routing, access, parking, construction vehicle loading/unloading and circulation within the site for contractors and other vehicles related to construction operations, measures to prevent mud and debris being taken onto the public highway, the erect of heras fencing adjacent to the retained reptile habitat, has been submitted for approval and thereafter shall be implemented as approved;
16. Hours of working during construction to be restricted to between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
17. A minimum of 10% of the new staff parking spaces (excluding the drop-off / pick-up spaces) shall be provided with Electric Vehicle charging points. In addition, a further 20% of the new spaces (excluding the drop-off / pick-up spaces) shall be provided with passive service i.e. ducting / cabling only). Details and location of these shall be submitted and approved by the County Planning Authority prior to first occupation of the new buildings;
18. The annual review of the School Travel;
19. Travel Surveys of both staff and pupils to be undertaken annually in accordance with the submitted School Travel Plan (via the Jambusters website) and compared to the targets given. Any further mitigating measures, if the targets are not met, to be submitted to and approved by the County Planning Authority. Any identified shortfall in the bus services to be appropriately addressed in accordance with the submitted MOU regarding provision of bus services;
20. The Car Park Management Plan is to be monitored and reviewed annually as part of the annual School Travel Plan review;
21. The revised internal road layout and bus stopping / turning area to be completed prior to first occupation;
22. The proposed drop-off / pick-up area as shown on the submitted plans to be completed and fully operational prior to first occupation of the new buildings;
23. The submitted Car Park Management Plan to be reviewed annually in co-ordination with other on-site operators and any amendments to be submitted and approved by the County Planning Authority;
24. The car parking spaces as shown on the submitted drawings shall be provided prior to first occupation and shall thereafter be maintained for that sole purpose;
25. A minimum of 20 secure and weatherproof cycle parking spaces shall be provided prior to first occupation in accordance with details to be submitted to and approved by the County Planning Authority and shall be maintained thereafter, and with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. The number of cycle parking spaces shall be review annually alongside the School Travel Plan and the number of spaces increased if necessary;
26. If, during development, contamination not previously identified is found to be present at the site then no further development unless otherwise agreed in writing with the County Planning Authority shall be carried out until a remediation strategy detailing how this contamination would be dealt with has been submitted to and

approved in writing by the County Planning Authority. The remediation strategy shall be implemented as approved;

27. No infiltration of surface water drainage into the ground is permitted other than with the written approval of the County Planning Authority. The development shall be carried out in accordance with the approved details;
28. 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 County Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment prepared by CTP dated 13 January 2022 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;
29. No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system, and prepared by a suitably competent person, has been submitted to and approved by the County Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed;
30. Before the first use/occupation of the development hereby permitted, details regarding the proposed community use of the School's indoor sports facilities and school hall, shall be submitted to and approved in writing by the County Planning Authority, including type of use, hours of use, management of access by non-school users and use of the on-site car parking; and
31. The removal of the temporary modular buildings related to the 2FE expansion.

150.Informatives

1. The applicant is required to obtain any necessary highway approvals.

Case officer - Lidia Cook	Tel No.03000 413353

Background documents - See section heading

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E1 COUNTY MATTER APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED/REFUSED UNDER DELEGATED POWERS - MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents - The deposited documents.

DO/21/761/R2 & R3 Details of the 3-metre-high barrier (to the south of the site) (Condition 2) and details of the timber enclosure for the bag filter fan (Condition 3) pursuant to planning permission DO/21/761.
Flisher Energy, Fernfield Lane, Hawkinge, Kent CT18 7AP
Decision: Approved

E2 COUNTY COUNCIL DEVELOPMENT APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED UNDER DELEGATED POWERS MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents – The deposited documents

DO/19/1120/R30 &R31 Submission of details of a Community Use Agreement and a Pitch Management and Maintenance Scheme pursuant to Conditions 30 and 31 of planning permission DO/19/1120.
Dover Grammar School For Boys, Astor Avenue, Dover, Kent CT17 0DQ
Decision: Approved

DO/20/1048/R23 Details of piling using penetrative methods, pursuant to condition 23 of planning permission DO/20/1048.
Dover Fastrack - Land to the north of Dover and to the south of Whitfield, Kent
Decision: Approved

DO/22/654 Installation of a Multi-Use Games Area.
Cartwright & Kelsey Primary School, School Road, Ash, Canterbury, Kent, CT3 2JD
Decision: Permitted

FH/22/103 Supply and installation of a Multi-Use Games Area including Fence Enclosure and access footpath.
Stowting Church Of England Primary School, Stowting Hill, Stowting, Kent TN25 6BE
Decision: Permitted

GR/21/0823/R20	Details of on-site secure and weatherproof cycle parking totalling a minimum of 40 spaces pursuant to Condition 20 of planning permission GR/21/0823. Gravesend Grammar School For Boys, Church Walk, Gravesend, Kent DA12 2PR Decision: Approved
GR/22/0375	Laying of hardstanding and provision of parking. Mayfield Grammar School, Pelham Road, Gravesend, Kent DA11 0JE Decision: Permitted
SE/21/891/R14a&b	Details of an assessment of ground conditions (including drainage and topography of the land proposed for the playing field) which identifies constraints which could adversely affect playing field quality (Condition 14(a)) and details of a scheme to address such constraints (Condition 14(b)) pursuant to planning permission SE/21/891. Sevenoaks Grammar Annexe/Trinity School site, Seal Hollow Road, Sevenoaks, Kent TN13 3SN Decision: Approved
SW/22/501472	Demolition of an existing single storey two-classroom, mobile building and construction of a new single-storey modular two-classroom block, and new car parking bays. Davington Primary School, Priory Row, Faversham, Kent ME13 7EQ Decision: Permitted
SW/22/502334	Retention of temporary modular buildng for a further 5 years. Rose Street Primary School, Rose Street, Sheerness, Kent, ME12 1AW Decision: Permitted
TH/22/638	The erection of 1no. storage container in the staff parking area of Foreland Fields school as well as the retention of 14no. existing storage structures. Foreland Fields School, Newlands Lane, Ramsgate, Kent CT12 6RH Decision: Permitted

E3 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCREENING OPINIONS ADOPTED UNDER DELEGATED POWERS

Background Documents –

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
- *The Government's Online Planning Practice Guidance-Environmental Impact Assessment/Screening Schedule 2 Projects*

(a) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does not constitute EIA development and the development proposal does not need to be accompanied by an Environmental Statement:-

None

(b) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does constitute EIA development and the development proposal does need to be accompanied by an Environmental Statement:-

None

(c) The following screening opinion was adopted under delegated powers on 18 January 2022 but was not previously reported due to an oversight. The screening opinion stated that the proposed development did not constitute EIA development and the development proposal did not need to be accompanied by an Environmental Statement:-

KCC/SCR/SW/0228/2022 – Screening Request and Request for Approval Under Regulation 77 of the Conservation of Habitats & Species Regulations 2017 for a proposed Cementitious Materials Importation and Storage Facility.
Robert Brett & Sons Ltd, Land at Port of Sheerness, Isle of Sheppey, Kent, ME12 1RS.

In addition to an EIA screening opinion, a Habitats Regulations Assessment Screening Opinion was also issued under Regulation 77 of the Conservation of Habitats & Species Regulations 2017 on 18 January 2022. This concluded that no likely significant effects to a European designated site would occur and that the project could be screened out at Stage 1 of the Habitat Regulations Assessment (HRA) process meaning that appropriate assessment was not required in this instance.

E4 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCOPING OPINIONS ADOPTED UNDER DELEGATED POWERS

(b) Since the last meeting of the Committee the following scoping opinions have been adopted under delegated powers.

Background Documents -

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
- *The Government's Online Planning Practice Guidance-Environmental Impact Assessment/Preparing an Environmental Statement*

None

Growth and Communities

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Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

Nichola Reay
Paddock Wood Town Council
The Podmore Building
St Andrews Field
St Andrews Road
Paddock Wood
Kent,
TN12 6GT

6 June 2022

BY EMAIL ONLY

Dear Nichola Reay,

Re: Paddock Wood Neighbourhood Plan (2022-2038) - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Paddock Wood Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Part I: Strategy

4. Future Growth Strategy

Quality of Life

Public Rights of Way (PRoW): In regard to paragraph 4.23, the County Council welcomes the themes of Health (Recreation), Nature (Green Space and Interaction) and Movement (Walking and Cycling) within the Quality of Life Framework in the Neighbourhood Plan. These themes dovetail with the KCC Rights of Way Improvement Plan (ROWIP) and KCC would therefore encourage the Town Council to reference the ROWIP when considering countryside access projects surrounding Paddock Wood.

Part II: Policies

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, would recommend that reference is made to the necessity for any development which comes

forward to comply with the safeguarding policies of the Kent Minerals and Waste Local Plan 2013-30. This includes development which may have implications on sites allocated for mineral extraction within the Kent Mineral Sites Plan.

6. Green Infrastructure

Access to the Countryside

PRoW: In reference to paragraph 6.12, KCC is currently working with developers to ensure protection and enhancement of the PRoW within the Church Farm development footprint. Advice has also been provided to The Hop Pickers Line Heritage Group for themed furniture and waymarking.

The County Council is supportive of the Paddock Wood Neighbourhood Plan and welcomes future engagement with the Town Council.

Biodiversity

Biodiversity: The County Council welcomes the consideration of biodiversity as a key theme throughout the Neighbourhood Plan.

Policy PW GI3 – Biodiversity

Biodiversity: KCC supports the inclusion of habitat creation and enhancement within the policy. However, KCC would encourage an update to the policy to include a requirement for ecological enhancement features within new developments, specifically within buildings and the wider site. These features could include integrated bat, bird and insect bricks within the buildings, and features such as log piles, hedgehog highways and species boxes within the site. Whilst this is discussed in paragraph 6.27, the County Council would recommend that this is reflected within the policy.

Flooding and Drainage

Sustainable urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, notes the inclusion of the 'Water People Places' report in paragraph 6.35 of the Neighbourhood Plan. This report is relevant although KCC would emphasise that it can only be used as guidance. It would therefore be advisable to include a statement within the Neighbourhood Plan which refers to the requirement for any design associated with a major development to comply with the guidance and policies of KCC's Drainage and Planning Policy Statement (Appendix A).

The Town Council may also wish to consider referencing paragraphs 159 through 169 of the National Planning and Policy Framework (NPPF), given that these are specific to planning and flood risk. For example, paragraph 161 states the need to *"(use) opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding*" and paragraph 167 states that "*Major development should incorporate sustainable drainage systems…(and) should where possible, provide multifunctional benefits".*

KCC would draw attention to Neighbourhood Planning Support which includes specific advice on the inclusion of the environment and surface water within Neighbourhood Plans such as "Neighbourhood Planning for the Environment".

Policy PW GI4 – Flooding and Drainage

SuDS: The County Council is supportive of this policy within the Neighbourhood Plan.

9. Access & Movement

Highways and Transportation: The County Council, as Local Highway Authority, is pleased to note that the Neighbourhood Plan reflects the NPPF requirements. KCC also welcomes the innovative examples of access and movement options within the Neighbourhood Plan.

10. Housing & Infrastructure

Social and Community Facilities

Waste Management: The County Council, as Waste Disposal Authority, recognises the need for additional waste infrastructure in the district to meet the demands of housing growth. In particular, the strategic allocations in the Paddock Wood area will place significant pressure on waste services as referenced in the Infrastructure Delivery Plan (IDP) and in this Neighbourhood Plan. KCC would therefore advise that this need is made clearer in the Neighbourhood Plan, by amending paragraph 10.43 to:

> 'The IDP (March 2021), published alongside the submission Local Plan, identifies the need for a range of infrastructure items to support new growth and expansion of the town. *This includes provision of new waste infrastructure within the district to ensure a sustainable waste management service is maintained.*'

11. Projects

County Council Community and Infrastructure Services: The County Council, as a key infrastructure and service provider, acknowledges that the Town Council is proposing to utilise Section 106 contributions for a number of projects and aspirations within the Neighbourhood Plan. KCC would welcome further consideration relating to the provision of other forms of infrastructure such as education, social care, waste, adult education, libraries and youth services which are also important to support a sustainable community.

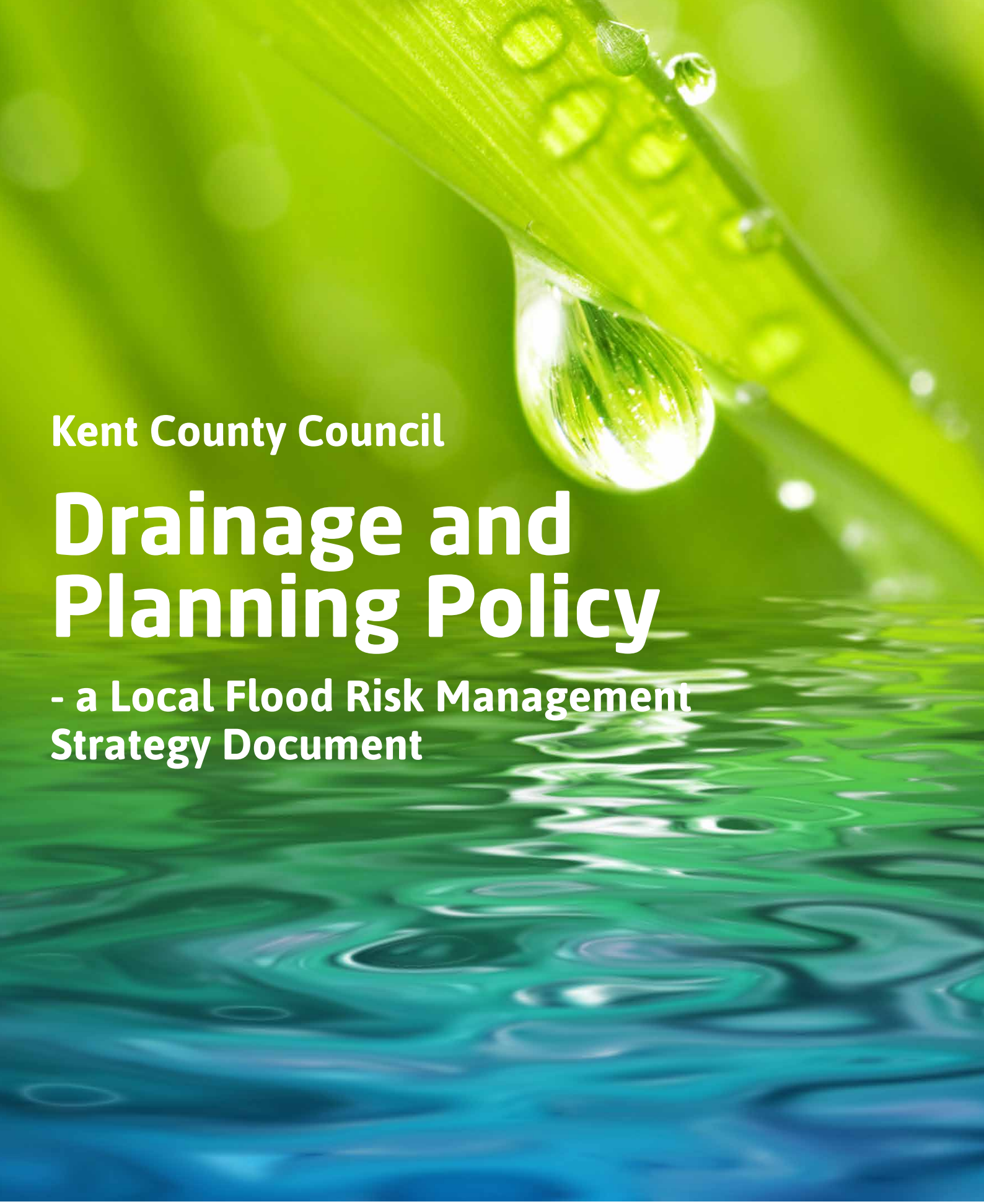
KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

Stephanie Holt-Castle
Director for Growth and Communities

Encs:

Appendix A: KCC Drainage and Planning Policy Statement



Kent County Council

Drainage and Planning Policy

- a Local Flood Risk Management Strategy Document

December 2019

Kent County Council
kent.gov.uk

Table of contents

Date	Revisions details
October 2016	Clarification on technical matters; submission summary form.; pre-application advice; post-construction verification reports; standard advice.
June 2017	Further clarification of technical matters and amendments to general wording including revised M5-60, 50% reduction for brownfield sites, runoff control per soil type, discharge to highway systems, off-site drainage improvements and developer contributions.
November 2019	Clarification of drainage submission requirements and revised drainage policies to reflect latest changes in NPPF and include the requirements for a verification report and any changes as a result of consultation.

The overall policy will be assessed biennially and reviewed when National policy or other relevant policy changes occur.

1 Role of this Policy

This policy sets out how Kent County Council (KCC), as Lead Local Flood Authority (LLFA) and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development. It is consistent with the Non-Statutory Technical Standards for Sustainable Drainage (as published by Defra in March 2015) and sets out the policy requirements KCC has for sustainable drainage. It should be read in conjunction with any other policies that promote sustainable drainage, specifically:

- the National Planning Policy Framework and,
- any specific policy set out by the relevant Local Planning Authority

This policy is also supported by KCC guidance and policy provided in:

- Kent Design Guide Technical appendices ('Making It Happen') 2019;
- Water. People. Places - a guide for Masterplanning sustainable drainage in developments;
- KCC Land Drainage Policy

The aim of this policy document is to clarify and reinforce these requirements. It also includes references to other design considerations which impact sustainable drainage design and delivery.

This policy should be used by:

- developers when considering their approach to the development of new sites or redevelopment of brownfield sites;
- developers or their consultants when preparing submissions to support a planning application for major development;
- professionals involved in developing drainage schemes including engineering and urban and landscape professionals;
- development management officers when considering development applications,
- Local Authorities when developing local planning and land-use policy.

With this current update, we seek to ensure that multifunctionality of open space is now emphasised within development master planning. This provides an opportunity for Kent to look to wider benefits of sustainable drainage and strengthen policies for the delivery of drainage systems which are fully sustainable, thus providing quantity control, quality improvement, biodiversity enhancement and amenity. Changes to the National Planning Policy Framework (NPPF) in 2019 and Defra's 25-Year Environmental Plan[1] promote a robust approach to sustainable development.

[1]25-year Environment Plan, published January 2018 on www.gov.uk/government/publications/25-year-environment-plan

2 Introduction

2.1 Background

KCC was made a LLFA for Kent by the Flood and Water Management Act 2010 (the Act). As LLFA, KCC has a strategic overview of 'local flooding'. Local flooding is defined by the Act as flooding which is caused by:

- Surface water,
- Groundwater,
- Ordinary Watercourses

The management of surface water within new development is a key factor in managing local flooding.

Since commencement of the Act in 2010, the Government has assessed various means of promoting sustainable drainage systems. In April 2015, LLFAs were made statutory consultees in planning for surface water. Our understanding of local drainage and local flood risk presents a strong platform from which to provide advice and guidance to Local Planning Authorities on the management of surface water.

In undertaking this role KCC coordinates with the 12 local authorities as well as Kent's own planning department and the Ebbsfleet Development Corporation. Where appropriate we will also liaise with other relevant flood risk management authorities, such as the Environment Agency, sewerage undertakers and the county's Internal Drainage Boards (IDB).

2.2 Legislative Framework

As a LLFA within Kent, KCC is required under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 ('the Development Management Procedure Order') to provide consultation response on the surface water drainage provisions associated with major development.

Major development is defined within the Development Management Procedure Order as development that involves any one or more of the following:

(a) the winning and working of minerals or the use of land for mineral-working deposits;
(b) waste development;
(c) the provision of dwelling houses where:
    (i) the number of dwelling houses to be provided is 10 or more; or
    (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
(e) development carried out on a site having an area of 1 hectare or more.

As a statutory consultee, KCC must provide a substantive response within 21 days of consultation (Article 22 of the Development Management Procedure Order). A substantive response is one which:

(a) states that the consultee has no comment to make;
(b) states that, on the basis of the information available, the consultee is content with the development proposed;
(c) refers the consultor to current standing advice by the consultee on the subject of the consultation; or
(d) provides advice to the consultor.

The Planning and Compulsory Purchase Act 2004 describes the duty to respond as a consultee, including the duty to report to the Secretary of State on compliance with the provision of substantive responses.

The Town and Country Planning (General Development Procedure Amendment No. 2, England) Order 2006 introduces the concept of Critical Drainage Areas as *"an area within Flood Zone 1 which has critical drainage problems and which has been notified [to] the local planning authority by the Environment Agency".* However, no Critical Drainage Areas have yet been defined within Kent and will not require further consultation.

2.3 Sustainable Drainage in Planning

Sustainable drainage systems are designed to control surface water as close to its source as possible. Wherever possible they should also aim to closely mimic the natural, pre-development drainage across a site. A well-designed sustainable drainage approach also provides opportunities to:

- reduce the causes and impacts of flooding;
- remove pollutants from urban run-off at source;
- combine water management with green space with benefits for amenity, recreation and wildlife.

The purpose of the planning system is to contribute to the achievement of sustainable development and deliver the requirements of the National Planning Policy Framework (NPPF). The use of sustainable drainage systems helps to achieve the sustainability objectives of the NPPF.

2.4 Design Strategies

Development has the potential to change surface water and ground water flows, depending upon how the surface water is managed within the development proposed. Planning applications for major development should therefore be accompanied by a site-specific drainage strategy that demonstrates that the drainage scheme proposed is in compliance with KCC's sustainable drainage policies, as outlined within this document.

The drainage strategy must also demonstrate that the proposed surface water management proposal is consistent and integrated with any other appropriate planning policy and flood risk management measures that are required.

2.5 Strategic Consultation

As a LLFA, KCC has a consultation role in relation to the preparation of local plans, neighbourhood plans, strategic flood risk assessments and other planning instruments produced by Local Planning Authorities[2].

KCC will provide advice and guidance on local flood risks and appropriate policy for any area upon request.

KCC will also provide information to individuals and other organisations with respect to drainage and local flood risk for use in the preparation of other relevant planning documents upon request.

[2] National Planning Policy Guidance, Flood Risk and Coastal Change, paragraph 2.

3 Planning policy and guidance for drainage

This section sets out the sources of planning policy relevant to the management of surface water. These policies will form the basis of KCCs assessment of any submitted drainage strategy. The drainage strategy will need to demonstrate how the development meets these requirements.

3.1 NPPF

The National Planning Policy Framework (NPPF) was published on 27 March 2012 with further revisions in 2019; it sets out the Government's planning policies for England and outlines how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the relevant Local Planning Authority's development plan, following public consultation and with due regard for other material considerations.

The NPPF is a material consideration in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, excepting where adverse impacts significantly outweigh the benefits (or where specific policies indicate that development should be restricted). Flooding and drainage may also be considered material considerations in the determination of planning applications as their management contributes to sustainable development.

Paragraphs 155, 157, 163, 165 and 170 of the NPPF (Appendix A) have particular relevance to flooding and drainage. These paragraphs include consideration for area of flood risk, incorporation of sustainable drainage systems, taking account of advice from LLFA, operational standards, maintenance requirements and multifunctionality.

The NPPF is supported by the **Planning Practice Guidance**[3] which provides further advice on how planning can take account of the risks associated with flooding in plan-making and the application process.

3.2 Water Environment Regulations 2003

The Water Environment Regulations 2003 make provision for the purpose of implementing in river basin districts the Water Framework Directive (Directive 2000/60/EC of the European Parliament) which established a framework for Community action in the field of water policy. These regulations will remain in place until such time that UK law is revised to reflect changes in EU membership. These Regulations require a new strategic planning process to be established for the purposes of managing, protecting and improving the quality of water resources[4].

Therefore, this provides an opportunity to plan and deliver a better water environment, focusing on ecology. The WFD aimed for the water environment to reach 'good' chemical and ecological status in inland and coastal waters by 2015. Planning and programmes are continuing in six year cycles until 2027.

The WFD drives water quality improvement planning along total river catchment areas, with the production of River Basin Management Plans. The directive puts a duty on public bodies to have regard to river basin management plans (and associated supplementary plans) when exercising their functions where it may affect a river basin district.

Controlling water is inherent in the WFD's objectives, as uncontrolled surface flow or flooding can cause unmanageable water quality problems. Sustainable drainage principles are key to meeting the objectives of the WFD in its continuing cycles.

3.3 Habitats Regulation 2017

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive[5]), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales.

The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.

Under the Regulations, competent authorities i.e. any Minister, government department, public body, or person holding public office, have a general duty, in the exercise of any of their functions, to have regard to the EC Habitats Directive and Wild Birds Directive.

The sites where habitats and species are legally protected due to their exceptional importance are known as Natura 2000 sites; this network protects rare, endangered or vulnerable habitats and species. The Natura 2000 network includes Special Areas of Conservation (SACs, identified under the Habitats Directive), Special Protection Areas (SPAs, identified under the Birds Directive) and Ramsar sites (wetlands of international importance designated under the Ramsar Convention). All Natura 2000, or 'European', sites are also classified as Sites of Special Scientific Interest (SSSIs) but not all SSSIs are Natura 2000 sites.

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[3] The Planning Practice Guidance is a web-based resources which can be accessed from the Planning Portal at: http://planningguidance.planningportal.gov.uk/?s=Drainage&post_type=guidance

[4] This framework became UK law in December 2003

[5] More information on the Habitats Directive can be found at: http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

3.4 Defra's 25-Year Environment Plan

The 25 Year Environment Plan was published in January 2018; it sets out government action to tackle the growing problems we face in the environment and aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species, reduce risk of environmental hazards and promote sustainable development.

The plan is supported by the concept of natural capital, meaning it places value on natural assets, which includes geology, soils, water and all living organisms. Specific components of the Environment Plan are introduced in current updates of the NPPF.

The Environment Plan will need to be underpinned by law and enforced by a new legal framework for the environment to replace the system the EU currently provides. It is beneficial to be aware of the changes in legislation and policy indicated in this plan as it provides government direction to sustainable development.

3.5 Non-statutory technical standards for sustainable drainage

To support the LLFAs statutory consultee role, Defra published the 'Non-Statutory Technical Standards for Sustainable Drainage Systems' on 23 March 2015. These standards provide advice and guidance for the design, maintenance and operation of sustainable drainage systems[6].

Further guidance on the application of the Non-Statutory Technical Standards will be provided by Defra and associated stakeholders.

A summary of the requirements of these non-statutory standards in provided in Appendix B. The policies in this policy are consistent with the Non-Statutory Technical Standards.

3.6 Local Authority Guidance

Local Planning Authorities are ultimately responsible for determining planning applications and have numerous planning and policy documents to support the delivery of sustainable development within their districts.

3.6.1 Local Plans and Neighbourhood Plans

National planning policy places Local Plans at the heart of the planning system. Local Plans set out a vision and a framework for future development of the area. Local Plans should be based upon and reflect the presumption in favour of sustainable development. They should also address housing provision, the economy, community infrastructure and environmental issues such as adapting to climate change and ensuring high quality design.

The management of flood risk and surface water can be dealt with through policies for sustainable construction, flood risk, open space, landscape character and green infrastructure. These policies may be supported by further Supplementary Planning Documents or guidance notes.

Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Parish Councils and Neighbourhood Forums (where there is no Parish Council) and their communities can shape development in their areas through the production of Neighbourhood Development Plans. These plans become part of the Local Plan and the policies contained within them are then used in the determination of planning applications.

Any drainage strategy should make reference to relevant Local Plan and Neighbourhood Plan policies. It may also have to provide evidence which supports delivery of biodiversity, amenity and other benefits.

3.6.2 Supplementary planning documents

Some local authorities in Kent have specific drainage guidance, policies and standards for development within their district areas, which may include specific surface water discharge rates. Other local authorities may introduce similar guidance. These documents provide substantive guidance on how drainage should be delivered.

3.6.3 Strategic Flood Risk Assessments (SFRA)

Strategic Flood Risk Assessments are required to inform the development of Local Plans, as stated within the NPPF. A SFRA assesses the risk to an area from flooding from all sources, taking into account the effects of predicted climate change. They should also assess the impact that land use changes and development will have on flood risk within the district in question. Each Local Planning Authority in Kent has prepared and referenced a SFRA within their planning documents. These documents provide key information on the potential sources and magnitude of flooding and may provide information for specific site allocations.

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[6] The Non-statutory Technical Standards are published at: https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards

3.7 Kent County Council Guidance

The Local Flood Risk Management Strategy (the Local Strategy) for Kent sets out a countywide strategy for managing the risks from local flooding. One of the five objectives set out in the Local Strategy specifically states the importance of 'ensuring that development in Kent takes account of flood risk issues and plans to effectively manage any impacts'.

To support delivery of this objective, KCC has developed guidance to define the approach to planning and design of drainage. When considering surface water drainage within new developments in Kent, it is therefore recommended that reference is made to specific guidance and wider information available:

3.7.1 Water. People. Places – a guide for masterplanning sustainable drainage into developments

This guidance outlines the process for integrating sustainable drainage systems into the masterplanning of large and small developments[7]. This guidance should be used as part of the initial planning and design process for all types of development, with specific reference made to the relevant development typologies.

3.7.2 Kent Design Guide Technical Appendices: Making It Happen

The Kent Design Guide was produced to ensure that all new development results in vibrant, safe, attractive, liveable places. 'Making It Happen' comprises technical appendices that provide advice and guidance on the design and construction of drainage systems which KCC may be adopting.

The sustainability chapter (drainage systems) has been revised in May 2019 and contains specific technical guidance for drainage design.

3.7.3 Land Drainage Policy

KCC has powers under Section 23 of the Land Drainage Act 1991 to consent works in an ordinary watercourse and to enforce the removal of unconsented works.

Land Drainage regulations are generally concerned with the physical condition of watercourses, including whether they are blocked or how they are modified, including the introduction of new structures to them. This policy sets out how Kent County Council exercises these land drainage functions.

3.7.4 Surface Water Management Plans

Surface Water Management Plans (SWMPs) have been prepared by KCC (in partnership with other relevant stakeholders) to identify specific local actions to manage local flood risk. They have been undertaken in areas which were identified as a potential risk from local flooding in the Preliminary Flood Risk Assessment. These studies may provide a greater understanding of the current flood risk. Any proposed development should include consideration of any findings and recommendations of the relevant SWMP for the area. The areas covered by SWMPs are regularly being updated and can be found on the KCC website[8].

3.7.5 Kent Environment Strategy

As part of a county wide partnership, KCC has produced a Kent Environment Strategy– A strategy for environment, health and economy (KES) setting out how Kent and their partners propose to address significant opportunities and challenges from environmental change and development pressures (such as a need for improved air and water quality, decline in biodiversity and the impacts of climate change)[9]. It is accompanied by an implementation plan and includes partnership actions that will deliver against the priorities set out in the strategy. KCC adopted the strategy in January 2016 and has invited the District Councils to also adopt it to provide a basis for co-ordinated action.

The KES recognises that the environment is a key part of the infrastructure supporting the Kent economy. The strategy aims to make the most of environmental opportunities whilst addressing challenges arising from development pressures, need for improved air and water quality, decline in biodiversity and the effects of climate change.

3.8 Other Guidance & Tools

In approaching or reviewing design, technical aspects may need clarification and specification in order to satisfy KCC that it meets the required standard. KCC will make reference to good practice presented within the following documents, and would recommend that any designer also refers to:

3.8.1 CIRIA SuDS Manual (C753), 2015

This guidance document provides comprehensive information on the all aspects of the life cycle of sustainable drainage from initial planning, design through to construction and management including landscaping, waste management and costs.

3.8.2 Building Regulations

Building Regulations exist to ensure the health, safety, welfare and convenience of people in an around buildings. Part H of the Building Regulations specifically covers drainage. The consultation with the LLFA addresses flood risk to and from developments and does not replace any requirement for Building Regulation approval.

3.8.3 BS 8582:2013 Code of practice for surface water management for development sites

The British Standard gives recommendation on the planning, design, construction and maintenance of surface water management systems for new development and redevelopment sites in minimizing and/or mitigating flooding and maximizing the social and environmental benefits.

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[7] The document can be found at: www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems

[8] SWMPs can be found at: www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/surface-water-management-plans

[9] The Strategy can be found at: http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kent-environment-strategy

3.8.4 UK Sustainable Drainage Guidance

The UK SuDS Tools website which provides estimation tools for the design and evaluation of surface water management systems. The website has been developed and is supported by HR Wallingford. The web site can be accessed at: https://www.uksuds.com/ .The website provides estimations for greenfield runoff, storage analysis and other tools.

3.8.5 Long Term Flood Risk Information

In 2013 the Environment Agency, working with LLFAs, produced the Long Term Flood Risk map, which depicts the risk associated with surface water flooding. The Risk of Flooding from Surface Water maps show flooding scenarios as a result of rainfall with the following chance of occurring in any given year (annual probability of flooding is shown in brackets): 1 in 30 (3.3%), 1 in 100 (1%), and 1 in 1000 (0.1%).

The Risk of Flooding from Surface Water map is published on the Gov.UK website on the "Long Term Flood Risk Information". This mapping is key to assessing overland flow routes and to identifying any locations at high risk of surface water flooding.

4 Drainage Consultation

4.1 Introduction

A drainage strategy should be submitted to the relevant Local Planning Authority along with any planning application for major development. It may either form part of a wider Flood Risk Assessment, or it can be submitted as a separate and dedicated standalone document.

Whilst consultation is not undertaken with KCC for minor development, applicants should be aware that the NPPF priorities for sustainable drainage do apply to all development, irrespective of scale (NPPF, Paragraph 163). Developers of sites for minor development are encouraged to consider the policies outlined in this document, as well as any local specific policy with respect to site drainage design. Applicants for these smaller developments are directed to guidance and standing advice on best practice to help minimise flood risk.

It is important that any consultation request we receive reflects the level of risk to a site (or the risk that may result from its development). Consequently, consultation may also occur for development, other than major development in areas of higher local flood risk, as described in Section 4.3.

Consultation on flood risk will also occur with other risk management authorities. For example, the management of tidal and fluvial flood risk and the prevention of inappropriate development in the associated flood-plain remains the responsibility of the Environment Agency. The Environment Agency is also responsible for the management of permitting regulations which may affect discharge to water bodies or the ground. Similarly, if any drainage scheme requires connection to a public sewer, additional approval will be required from the appropriate sewerage undertaker.

Within Flood Zones 2 or 3 (areas of medium/high tidal or fluvial flood risk), a Drainage Strategy should be a component of a wider Flood Risk Assessment and should outline how the management of runoff will not exacerbate the existing flood risk to/from the development proposed.

A Flood Risk Assessment should also be submitted with any application for planning permission on sites in excess of 1 ha in Flood Zone 1 (low flood risk); in these instances the Flood Risk Assessment/Drainage Strategy should be primarily concerned with the management of surface water within the proposed development site.

Other third parties, including but not limited to the Environment Agency, IDB, The Highways Authority, the Sewerage Undertaker and adjacent landowners, could have an effect on the design of a drainage system. Consultation with relevant third parties is essential early in the design process. This information should be provided as part of the consultation process.

4.2 Consultation Process

4.2.1 Overview

Consultation with KCC will occur through the planning process. KCC will be notified of the submission of a major planning application by the Local Planning Authorities within Kent (as defined in Section 2.5).

A substantive response to the LPA is legally required from KCC within 21 days of consultation.

4.2.2 Pre-application Advice

Incorporating appropriate drainage is easier and more sustainable if it is planned and designed in from the start of a development. KCC encourages pre-planning consultation to ensure that the issues are appropriately addressed at an early stage.

Pre-planning advice from KCC can provide the following benefits:

- background information to identify constraints and matters in relation to flood risk and drainage pertinent to the application;
- an indication of whether a proposal would be acceptable in principle, saving time and cost within the planning process;
- reduced time to prepare the proposal;
- provides clarification of the guidance and policies that will be applied to the development proposal;
- identifies whether specialist input is required; and,
- identification and engagement of other key stakeholders.

KCC's pre-application planning advice in relation to new development is discretionary and is provided as a chargeable service. Details and forms for pre-application advice is found on kent.gov.uk. Standing advice for specific development scenarios and types is also available on Kent's website[10].

We provide free advice to:

- individual homeowners who have specific drainage or flood related issues which may impact their own house for development; and,
- Parish councils, Local community groups, or Flood Forums on works proposed to improve local communities.

4.2.3 Planning application submission

The Local Planning Authority will confirm that a Drainage Strategy has been submitted with the planning application and pass it to KCC for consultation. KCC will review the submitted material for adequacy and, depending upon the submission, may request further information. This will be communicated to the applicant via the Local Planning Authority.

The drainage strategy submitted to support a planning application must reflect the development proposal (including site area, type of development, general arrangement and layout).

All elements of the proposed drainage strategy should be within the defined planning and development application boundary as defined by the development's "red-line" boundary. This ensures that planning approval and any subsequent conditions will apply to the entirety of the drainage measures. It would not be acceptable to have any drainage measures, most notably attenuation basins or soakaways outside of the planning application site boundary unless secured by other planning conditions, approvals or agreements.

In reviewing a drainage application, KCC will, in the first instance, confirm compliance with this policy, national planning policy (as defined in the NPPF), and compliance with the Non-Statutory Technical Standards. Local planning requirements (as set out in Local Plans or other local planning documents) and other site-specific land-use factors that affect surface water management will also be referenced, where appropriate. Additionally, KCC will consider adherence to wider environmental principles of the NPPF that may have a bearing on drainage design (for example, water quality, biodiversity and amenity).

A consultation response will be prepared and returned to the Local Planning Authority within the required 21 days following receipt of a suitably detailed submission. The consultation response may result in a request for further information or for planning conditions for subsequent determination.

[10] www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems#tab-3

4.3 Consultation Submission Requirements

4.3.1 Introduction

Detailed information will be required to demonstrate that a drainage design is appropriate and will operate effectively. This information may be required for all drainage measures, including (but not limited to) pipe networks, attenuation features, ponds, soakaways and control structures.

Key design information must be evidenced and assessed. Key information which may be needed to demonstrate the feasibility or applicability of a design philosophy includes:

- existing discharge rates and post development discharge rates;
- ground investigation information, groundwater levels and infiltration rates;
- condition and connectivity surveys of receiving watercourses and sewers;
- ground level and topographical survey;
- deliverability of discharge destination and right to connect.

Detail of this technical information is provided in Chapter 6 of Making it Happen C2: Sustainable Drainage Systems. The lack of detailed technical information may increase the level of uncertainty we may have about the effectiveness of a drainage strategy. If the degree of uncertainty is great, this is that the proposal cannot clearly demonstrate a functioning system in line with requirements, then KCC will have grounds to object to the drainage proposal or may delay return of a substantive comment to the planning authority.

We therefore encourage pre-application discussion to identity any areas which may need further investigation or clarification to reduce any uncertainty with respect to the functioning of the system.

The detail provided in the submission will reflect the type of planning application submitted, whether 'outline' (Surface Water Management Strategy) or 'full' (Detailed Drainage Strategy) or discharge of condition (detailed design). The submission requirements are provided in Table 1 and are read as minimum requirements. It is expected that later stages of planning submissions will provide greater detail (such as estimates of storage vs modelled network calculations).

KCC recommends the inclusion of a summary sheet which contains pertinent information to assist in ensuring sufficient detail is submitted and to simplify the review process. A Drainage Strategy Summary Form is included in Appendix C.

We recommend that applicants confirm the submission requirements through pre-application discussion with KCC, particularly to identify any needs for ground investigation.

Table 1- Submission Requirements for stages of planning

Information required	Outline	Full	Reserved Matters	Discharge of Condition	Verification condition [11]
Identification of discharge destination					
Development information including location plan, site layout, and drainage schematic					
Surface water drainage strategy report or statement					
Calculation assumptions and results including impermeable areas, infiltration rates, network calculations and models					
Existing and proposed drainage arrangements			12		
Existing and proposed discharge rates					
Ground investigation reports/survey and soakage testing results					
Maintenance programs and access arrangements					13
As built drawings or tender construction drawings				14	
Exceedance plan [15]					
Catchment plans					
Water quality index					
Watercourse condition and connectivity					
Proposed detailed drainage network plans and cross-sections including cover and invert levels, locations of flow controls (Critical Drainage Assets)					
Attenuation device details including cross-sections					
Landscape Plan					
Discharge agreements, consents and/or evidence of third-party agreement for discharge to their system					
Phasing plan					
Identification or designation of maintaining authority/ organisation					

[11] specific requirement for confirmation of drainage. Please see section 4.3.5

[12] as required, where not already demonstrated in the original application
require greater design detail than previous planning stage Greatest amount of detail required

[13] Specific for each critical drainage asset

[14] Drawings of proposed construction

[15] includes conveyance, volume and depths

4.3.2 Large scale development

Surface water management strategies for large developments (with multiple phases) will require the submission of an overall drainage strategy at outline planning stage that provides the overall site drainage strategy and a framework for the delivery of the drainage in each phase of the site.

The Surface Water Management Strategy should set out the following for the whole site, and each phase:

- discharge destination(s);
- discharge rate and volume;
- catchment areas;
- estimated impermeable areas per phase and per catchment; and,
- phasing plan with timing of construction.

This Surface Water Management Strategy should act as an overall **drainage masterplan** for all phases of the development.

A Surface Water Management Strategy will be tied to a planning condition at the outline stage. Pre-application discussions are encouraged in the case of phased development to agree the level and detail of any strategic Surface Water Management Strategy and subsequent Detailed Drainage Strategies that will be required for each phase.

Depending upon the level of detail submitted at outline planning, it may be necessary to submit additional drainage information to accompany reserve matters associated with the layout to demonstrate that the Surface Water Management Strategy can be accommodated within the proposed layout.

Further details regarding the surface water management proposals for each phase of development should then be provided within a Detailed Drainage Strategy. Each phase must remain consistent with the overall site strategy and drainage masterplan.

Supporting information must be submitted to demonstrate that any variations can be accommodated within the site without exacerbating flood risk. The overall site Surface Water Management Strategy may be reviewed as different phases are delivered.

Large sites in close proximity or in one catchment are encouraged to cooperate or consult concurrently as there may be opportunities for combined solutions with mutual and greater benefit.

Any strategic drainage features that are required for the wider site's drainage strategy to function properly must be identified and delivered prior to the connection of the drainage from any phase or sub-phase. If a single site within a wider development (e.g. school or commercial site) is reliant upon the strategic drainage system, this must be clearly indicated within the phasing plan.

4.3.3 Consultation for minor and low risk development

Minor development will not normally be reviewed by KCC, unless specifically requested by the LPA due to local drainage concerns, existing or mapped surface water flood risk, or other matters identified by the LPA in relation to delivery of sustainable drainage.

In some instances, due to the size of the development or proposal, construction for drainage provision is not needed or substantial and therefore considered low risk. Low risk development for the purposes of consultation may be regarded, but not limited to:

- change of use[16];
- limited external building envelope alterations;
- or which results in less than 100 m^2 of additional impermeable area and which is not located in an area of existing flood risk or drainage problems.

4.3.4 Easements and way leaves

If any surface water flows off site and is required to cross third party land, then information must be submitted which demonstrates that the applicant has the ability to deliver the outfall from the site. This may require confirmation of agreement from a third-party landowner or confirmation of an agreed easement way leave.

4.3.5 Maintenance and verification

The design of any drainage system must take into consideration the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work.

The continued operation of any drainage system is dependent upon ongoing maintenance, which may be undertaken by an adopting authority or management agent. Any drainage strategy must include details of the intended adopting authority or agent and specific details of appropriate and sufficient maintenance, and then be confirmed in the verification report.

Developers will be required to demonstrate that the drainage was constructed according to the approved plans through post-construction verification reports. These reports will also include maintenance and requirements specific to the drainage system constructed. Detailed drainage layouts will be required which also identify "critical drainage assets[17]".

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[16] change of use where vulnerability is not increased

[17] KCC's definition of critical drainage assets would be those items of interest in relation to Section 21 (1A) of the Flood and Water Management Act (2010), namely any assets that are "likely to have a significant effect on a flood risk in its area" and could include items such as inlets, outlets, controls, attenuation structures etc. Further clarification can be provided by contacting KCC's Flood and Water Management team.

4.4 Adoptable highways and drainage

Most major development would normally include some aspect of highway construction or improvement, which may be adopted or require approval by KCC as the Highway Authority. The provision of drainage to adopted highways is normally subject to Section 38 or 278 Agreement, with approval and inspection by KCC as the Highway Authority.

Highway matters may be reviewed within the consultation by KCC as LLFA. KCC will endeavour to seek internal consultation on such matters; however, the detail provided within a planning submission may not be sufficient. The response from KCC as LLFA does not commit KCC as Highways Authority to any particular highways arrangement. The nature and extent of adoption should be confirmed with the Highways team at an appropriate time within the planning and design process.

Any review provided by KCC as LLFA within the planning process does not constitute a technical approval; however the LLFA's approval may be required prior to any further adoption by KCC as the Highways Authority.

5 Policies for Sustainable Drainage

5.1 Introduction

A range of sustainable drainage techniques may be utilised across a site to manage the surface water runoff from the planned development; the use of more than one technique will often be appropriate to achieve the objectives of sustainable development on any given site (notwithstanding situations which may still arise where a conventional solution may be the most appropriate).

Given the range of design options to provide a drainage solution, KCC has defined:

- **Drainage Policies (SuDS Policy 1 through 6) that set out the requirements for a drainage strategy to be compliant with the NPPF and guidance within the Non-Statutory Technical Standards for Sustainable Drainage.**
- **Environment Policies (SuDS Policy 7 through 9) that set out expectations to be considered within a drainage strategy in response to environmental legislation and guidance that KCC and the Local Planning Authorities have a duty to comply with.**

These policies, summarised in Table 2, reflect the requirements of the Local Flood Risk Management Strategy, Surface Water Management Plans and Local Planning Authority Local Plans. Sufficient information must be submitted to demonstrate that the drainage proposals comply with these policies.

Table 2: Kent County Council SuDS Policies

Policy	Summary
SuDS Policy 1	Follow the drainage hierarchy
SuDS Policy 2	Deliver effective drainage design
SuDS Policy 3	Maintain Existing Drainage Flow Paths & Watercourses
SuDS Policy 4	Seek to Reduce and Avoid Existing Flood Risk
SuDS Policy 5	Drainage sustainability and resilience
SuDS Policy 6	Sustainable Maintenance
SuDS Policy 7	Safeguard Water Quality
SuDS Policy 8	Design for Amenity and Multi-Functionality
SuDS Policy 9	Enhance Biodiversity

5.2 Drainage policies

These policies are specified from the NPPF and the guidance within the Non-Statutory Technical Standards for Sustainable Drainage, as published by Defra.

5.2.1 SuDS Policy 1: Follow the drainage hierarchy

Surface runoff not collected for use must be discharged according to the following discharge hierarchy:

- **to ground,**
- **to a surface water body,**
- **a surface water sewer, highway drain, or another drainage system, or**
- **to a combined sewer where there are absolutely no other options, and only where agreed in advance with the relevant sewage undertaker.**

The selection of a discharge point should be clearly demonstrated and evidenced.

When development occurs, the urbanisation process within a catchment affects the natural hydrology; if the destination of the water is altered this may result in:

- a reduced supply of rainfall to groundwater;
- an accelerated passage of flow to the receiving watercourses; and
- water directed away from existing receiving catchments.

In order to maintain the natural balance of the water cycle, the above discharge hierarchy must be adhered to. Where development results in changes in runoff destinations, the design must account for how the surface flows are managed and demonstrate it does not exacerbate off-site flood risk.

Any development application must follow the hierarchy and be accompanied by evidence as to why infiltration is not utilised. Technical information on the uses of infiltration is provided in Kent Design Making It Happen, including testing methodology and design criteria. Infiltration testing must assess infiltration rates appropriate to underlying ground conditions and may require consideration of both shallow and deep infiltration.

If infiltration is not feasible further information is required from appropriate authorities indicating the acceptability of a discharge location, discharge rate and consent to connect. This agreement may be with the relevant owner or responsible body including IDBs, highway authorities, sewerage undertakers, riparian owners, port authority, Environment Agency, Canals and River Trust and others.

Any connection or discharge must be compliant with regulations or guidance governing the operation of the existing drainage system (e.g. IDB by-laws or standard specifications for public sewers). Correspondence with the relevant owner or responsible body should be submitted to demonstrate agreement in principle to the discharge and connection point as early in the development planning process as possible.

If we are aware of a capacity issue or a sewer flooding issue that a sewer connection is likely to exacerbate, we will inform the Local Planning Authority and the sewerage undertaker. We may oppose any such proposal until it can be adequately demonstrated that the receiving authority has confirmed the acceptability of the intended rate of discharge.

Discharge to Ground

The drainage strategy may be constrained if the drainage discharges to the ground via infiltration in a source protection zone (specifically SPZ 1), area of low permeability or area with high groundwater. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in these areas, specifically in relation to groundwater contamination. We recommend reference to the EA's latest policy guidance on groundwater protection[18].

Discharge to Sewer

An existing connection to a sewer does not automatically set a precedent and it must be demonstrated why infiltration and/or a connection to a watercourse cannot be utilised. There is a presumption against any discharge of surface water to a foul sewer.

Combined sewer systems, which carry both foul and surface water, have limited capacity and are more likely to lead to foul flooding. In our commitment to ensuring development is sustainable, we will therefore seek to reduce surface water discharges to combined sewer systems.

We will encourage developers to look for available surface water systems within a radius of the proposed development before discharges to a combined sewer is agreed acceptable. For small developments surface water sewer connections should be assessed within 90m of the development site boundary. For larger development (over 100 units), a suitable distance for connection to a surface water sewer will be assessed at the time of planning, dependent upon the size and location of the development.

Where a surface water connection to an existing combined sewer is unavoidable, it must be undertaken in such a manner and at such a location to facilitate future separation of the surface water from that combined system.

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[18] The Environment Agency's approach to groundwater protection, February 2018 or latest version as published. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Envirnment-Agency-approach-to-groundwater-protection.pdf

Discharge to Highway Drains

KCC may consider surface water discharges into highway drainage sewers in the following circumstances:

a) the developer/property owner is prepared to upgrade the system where required to accommodate any increased flows; and,
b) there is a proven existing connection to the highway drainage systems.

Highway drainage connections should be raised in pre-application discussion with KCC to ensure there will be appropriate arrangements in place for highways and drainage adoption, where appropriate. Highways advice for planning applications is provided on the County's website. Please refer to Kent Design Guide - *'Making it Happen'.*

Other Consents

Other consents by regulation may be required in relation to the discharge location (e.g. Flood Risk Activity Permit and Ordinary Watercourse consent). KCC may recommend consultation with other authorities in these instances.

5.2.2 SuDS 2: Deliver effective drainage design

Any proposed new drainage scheme must manage all sources of surface water and should be designed to match greenfield discharge rates, and volumes as far as possible.

Development in previously developed land should also seek to reduce discharge rates and volumes off-site and utilise existing connections where feasible.

Drainage schemes should provide for exceedance flows and surface flows from offsite, ensure emergency ingress and egress and protect any existing drainage connectivity, so that flood risk is not increased on-site or off site.

Design Criteria

The drainage system must be designed to be consistent with pre-development flow rates and designed to operate without any flooding occurring during any rainfall event up to (and including) the critical 1 in 30 year storm (3.33% AEP). The system must also be able to accommodate the rainfall generated by events of varying durations and intensities up to (and including) the critical, climate change adjusted 1 in 100 year storm (1% AEP) without any on-site property flooding and without exacerbating the off-site flood-risk. The choice of where these volumes are accommodated may be within the drainage system itself or within other areas designated within the site for conveyance and storage.

Flooding of the highway **may** be permitted in exceptional circumstances for rainfall events between 1 in 30 year and 1 in 100 year events provided that:

- depths do not exceed the kerb height;
- no excessive or prolonged ponding (beyond 10 minutes) so that the highway primarily operates as a conveyance route to another attenuation feature;
- flood extents are within the site boundary.

Rainfall Simulation

KCC will generally require the use of the more detailed and up-to date FEH13 dataset within detailed drainage design submissions. Where FSR data is used to determine the extreme rainfall intensity values for a site, we would expect the FSR/FEH ratios depicted in Appendix 1 of the 'Rainfall runoff management for developments' report[19] (Environment Agency, 2013) to be used to adjust the calculated attenuation requirements.

If FEH13 is unavailable (and unless otherwise calculated), we will accept a rainfall depth M5-60 of 26.25 mm to be utilised in appropriate modelling software to account for this variation.

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[19] http://evidence.environmentagency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/Rainfall_Runoff_Management_for_Developments_-_Revision_E.sflb.ashx

Runoff Rates

Greenfield runoff rates must be supplied. Preferred methods are IoH124, FEH, ReFH2 or others as agreed with KCC. The rates must reflect soil conditions specific to the site and applied to an appropriate drainage area consistently through the drainage strategy.

- Local District or Parish Greenfield Runoff Rates

Local planning policy may identify preferred discharge rates to be utilised in place of greenfield rates based upon a strategic flood risk assessment. In these areas, the preferred discharge rates should be utilised in the design.

KCC may also set strategic discharge rates to contribute to flood risk management within a district or parish council area; or to provide a more efficient approach to surface water management within a local area. If a strategic assessment of greenfield runoff rates has been undertaken by KCC, these rates must be utilised in design.

- Minimum discharge rates

Small sites are associated with low greenfield runoff rates. Given advances in technology and design of flow controls, it is now possible to achieve controlled flow rates of 2 l/s. This should be considered the minimum rate to be set for small sites, unless agreed with KCC.

- Capacity constraints

If the proposed development contributes to an area or network with known local flood risk issues or capacity constraints, then discharge rates and volume control specific to the local conditions will be specified. Developers may be required to provide flood risk modelling/ assessment to identify potential constraints.

- Previously developed land

Redevelopment on previously developed land or "brownfield land" has the potential to rectify or reduce flood risk. For developments which were previously developed, the peak runoff rate from the development must be as close to the greenfield runoff rate from the development as reasonably practicable for the same rainfall event, but must not exceed the rate of discharge from the development prior to redevelopment for that event. As a minimum we would expect to see evidence that a 50% reduction in the peak runoff rate from the existing site has been sought.

An assessment of the peak flow rate of an existing drainage system must consider: (a) the connectivity and condition of the drainage system; (b) the existing total impermeable area contributing to the drainage system; and (c) the pipe full capacity of the final 5m of the outfall pipe. Within all accompanying calculations, the post-redevelopment discharge rate must take account of the predicted effects of climate change.

Runoff characteristics for a previously developed site can be estimated by other methods as described within the CIRIA SuDS Manual (Chapter 24.5). It should be noted that if a simulation model for any existing network is utilised, the operation of the network must be confirmed by a network survey to establish the network arrangements, contributing areas and network condition.

Runoff Volumes

Runoff volumes from the developed site will usually increase in comparison to the site in its natural condition; this may increase flood risk in natural receiving systems. Controlling the volume of runoff from the site is therefore vital to prevent flood risk in natural systems. Within Kent, the need and type of volume control will vary according to the soil type present, which can be broadly broken down into the following categories:

- Highly permeable soils – in areas underlain by chalk, we will expect that use of infiltration will be maximised. With no off-site discharge, additional volume control will not be required
- Intermediate permeability soils - in these areas infiltration should still be maximised; offsite discharge should be limited to QBAR, (the mean annual flood flow rate, equivalent to an approximate return interval of 2.3 years). Where sites are small and flows are calculated to be less than 2 l/s, the minimum flow rate will apply of 2 l/s.
- Low permeability soils - areas underlain by largely impermeable soils (e.g. Weald clay and London clay) will require "staged" discharge.

This requires that rates mimic existing greenfield runoff rates of the 1:1 year, 1:30 year and 1:100 year storm events as long as long term storage is utilised for flow volumes in excess of the greenfield volume for the 1:100 year 6 hour event.

The long term storage volume must discharge at a rate no greater than 2 l/s/ha and the total flow rate must not exceed the 1:100 year greenfield flow rate.

If long term storage is not designed for, QBAR should be applied to all events from the 1:30 year rainfall event.

Exceedance

Exceedance flows that cannot be contained within the drainage system shall be managed in flood conveyance routes. The primary consideration shall be risks to people and property on and off site.

Exceedance should be considered in two parts; very high intensity storms to ensure bypass flows from overloaded pipework (including potentially blocked gullies due to debris), and overfilling of storage systems. Consideration of exceedance routes will ensure that any residual risk arising from either or these are safely managed.

Emergency access arrangements

Access should be maintained into and through the site for emergency vehicles during all storms up to (and including) the critical, climate-change adjusted 1 in 100 year event. The drainage application must give consideration to flood risk vulnerability classifications (as defined through Planning Practice Guidance to the National Planning Policy Framework), as specific measures or protections may be assessed and need to be agreed with the appropriate authority.

Unrestricted discharge rates

If the proposed system discharges to a watercourse or main river, consideration must also be given to any requirements due to high water levels in the receiving watercourse due either to tide (i.e. tide-locking) or flood flows. Attenuation volumes required onsite to manage flows must take into account the effects of high receiving water levels. This also applies to connection made to sewers.

If the proposed site is immediately adjacent to a watercourse or main river, there may be instances where direct discharge to the waterway is promoted without attenuation. This is only likely to be a recommendation on or immediately upstream from tidal areas. Direct discharge without attenuation or limited attenuation based on high (non-standard) discharge rates to a main river must be agreed in consultation with KCC and the Environment Agency.

Phased Delivery

If a proposed development is to be delivered in phases, a commitment should be made for a surface water management strategy to be delivered with the first phase of development, designed to be capable of accommodating the runoff from each of the subsequent phases. If this is not possible, the runoff from each separate phase must be controlled independently.

Whichever approach is taken, the control of surface water runoff during construction should be considered. Temporary works may be required to accommodate phased construction. Any temporary drainage measure must be identified and clearly shown on a drainage layout drawing.

5.2.3 SuDS Policy 3: Maintain Existing Drainage Flow Paths & Watercourses

Drainage schemes should be designed to follow existing drainage flow paths and catchments and retain where possible existing watercourses and features.

By mimicking the natural drainage flow paths and working within the landscape, more effective and cost-efficient design can be developed. Working with existing natural gradients also avoids any reliance on pumped drainage, with its associated energy use and failure risk. The natural environment including woods, trees and hedgerows can play a part in water management.

KCC encourages maintenance of the existing flow paths and drainage connectivity. Where this is the case the following conditions apply:

a) If the proposed development is reliant on an existing discharge point, then it is recommended that the condition and conveyance capacity is confirmed through CCTV or other survey with the discharge capacity confirmed.

b) Outfalls to ordinary watercourses should not occur to "blind-ended" ditches and should be part of a wider and contiguous drainage network.

Some sites may lie in or near more than one hydrological catchment. Surface water flows should be continued through the pre-development catchments and not diverted to adjacent catchments, in order to preserve the hydrology of catchments and prevent an increase in flood risk.

Ordinary Watercourses

An 'ordinary watercourse' is defined as any channel capable of conveying water that is not part of a 'main river'; Small rivers, streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) can all be classified as 'ordinary watercourses'.

When considering the development/redevelopment of any site, existing ordinary watercourses should be identified and accommodated within any drainage strategy and site masterplan. They should be preferably retained as an open feature within a designated corridor, and ideally retained within public open space. Any outfall to an ordinary watercourse should be designed to ensure there is adequate erosion protection for the receiving channel and its banks.

It is not sufficient to undertake earthworks to the top of the bank of a boundary ditch. Any site improvements should include the channel itself. The landowner has riparian responsibilities for these ditches and new development provides an opportunity to address any existing ditch issues such as excessive vegetation, channel clogging, culvert improvements or bank stability.

It is recommended that any discharge to an ordinary watercourse or any modification to an ordinary watercourse be identified and agreed in principle with KCC (or other consenting

authority if required) prior to the submission of any planning application. The ability of a watercourse to convey water (and to function as an effective exceedance flow route, where appropriate) will always need to be maintained.

Flood risk

For ordinary watercourses, developers may need to consider the potential flood risk arising from them, particularly where there are structures which might influence water levels. Where a risk from flooding has been identified, appropriate flood risk mitigation should be identified and agreed with the Local Planning Authority/ KCC; development should be avoided in any area likely to be affected by exceedance of the channel's capacity, reflecting requirements of SuDS Policy 4.

Culverts

Culverting of open watercourses will not normally be permitted (except where demonstrably essential to allow highways and/or other infrastructure to cross). In such cases culverts should be designed in accordance with CIRIA C689: Culvert Design and Operation Guide, (2010) and KCC's Land Drainage Policy. Culverts will not be approved below/ beneath any proposed structure.

If a culverted watercourse crosses a previously developed site, it should be reverted back to open channel, wherever practicable. In any such case, the natural conditions deemed to have existed prior to the culverting taking place should be re-instated.

Measures should be in place to ensure that any future owner of a property through which a watercourse passes is aware of their maintenance responsibilities as a riparian owner.

Under the terms of the Land Drainage Act 1991, any works within an ordinary watercourse will require consent under Section 23 of the Act. This will be either from KCC or from an IDB (in the areas where they operate). Consents are unable to be amended once granted so any changes to design will need to apply for Land Drainage consenting again. Consents cannot be granted retrospectively if works are undertaken prior to approval.

If land drainage consent is required in relation to the proposed development, we recommend that the submission of any application for consent is delayed until planning permission is granted, (excepting instances when consents are required to construct or upgrade site access) as the proposed site layout may be subject to further change. Please refer to KCC web pages for guidance on ordinary watercourse consents[20].

Overland flow paths

Account should be taken for any overland flow routes which cross the site from adjacent areas. Flow routes may be indicated by reference to the EA's surface water flow mapping however the magnitude of the contribution from upstream catchments should be assessed to determine flows and the extents of flooding. It is usually preferred that these flow routes would be accommodated within the development layout; however, flood assessment or more detailed modelling may be undertaken if these routes are to be modified or channelised. It is not acceptable to culvert overland flow routes.

5.2.4 SuDS Policy 4: Seek to Reduce and Avoid Existing Flood Risk

New development should be designed to take full account of any existing flood risk, irrespective of the source of flooding.

Where a site or its immediate surroundings have been identified to be at flood risk, all opportunities to reduce the identified risk should be investigated at the masterplanning stage of design and subsequently incorporated at the detailed design stage.

Remedial works and surface water infrastructure improvements may be identified in the immediate vicinity of the development to facilitate surface water discharge from the proposed development site.

Paragraph 165 of the National Planning Policy Framework outlines how flood risk management bodies should seek to manage flood risk through using opportunities offered by new development to reduce the causes and impacts of flooding, taking the predicted effects of climate change into account.

As LLFA, KCC will endeavour to ensure that this principle is applied across the County. Where a developer's Drainage Strategy has identified that there are existing flood risks affecting a site or its surroundings, there would be an expectation that the developer manages the identified risk appropriately to ensure that there are no on or off site impacts as a result of any development. Similarly, where there are opportunities to reduce the off-site flood risk through carefully considered on-site surface water management, we will encourage developers to explore these fully.

Avoiding areas of flood risk

All development should be preferentially located in the areas of lowest flood risk, irrespective of the source of flooding. At the earliest stages of masterplanning, an appropriate flood risk or drainage impact assessment should be undertaken to ensure that any vulnerable forms of development are located outside Flood Zones 2 or 3 and/or those areas identified as being at medium to high risk of surface water flooding. The Environment Agency's Flood Map for Planning and Long-Term Flood Risk pages should be referred to for this information.

Residential buildings should in the first instance not be located within any area indicated to be at high risk[21] from surface water flooding, according to the Long Term Flood Risk[22] maps or any local flood maps.

If development is unavoidable within a surface water flood risk or flow route, then the land use should be water compatible; designed and constructed to be flood resilient; having consideration of the estimated flow depths and be designed accordingly.

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[20] www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/owning-and-maintaining-a-watercourse

[21] High risk means that each year an area has a chance of flooding of greater than 3.3% (i.e equates to 1 in 30-year risk of flooding), with flood depths over 900mm and velocities over 0.25 m/s.

[22] https://flood-warning-information.service.gov.uk/long-term-flood-risk

Remedial works and infrastructure improvements

Local flood risk "hot spots" may be known to KCC or the local council in the vicinity of the proposed development. If the receiving system is in a poor condition and unable to convey flow effectively, remedial works may be required prior to connection or discharge to the system.

A condition survey of the outfall location and of the receiving system may be required to confirm connectivity and capacity along with any potential works required to ensure discharge can occur without impedance.

Dependent upon ownership and responsibilities, these works may be recognised as part of the development description for the proposed development as would occur for any infrastructure improvement to accommodate strategic growth, new connections and new local development.

5.2.5 SuDS Policy 5: Drainage Sustainability and Resilience

The design of the drainage system must account for the likely impacts of climate change and changes in impermeable area over the design life of the development. Appropriate allowances should be applied in each case.

A sustainable drainage approach which considers control of surface runoff at the surface and at source is preferred and should be considered prior to other design solutions.

Drainage infrastructure normally has a defined design life. This varies depending upon the nature of the system's components. The drainage must be designed to function properly to protect the development and downstream from flooding over this timeframe. This includes accommodating predictable changes, including climate change and urbanisation.

Climate Change

In 2016, the Environment Agency published new guidance on how to use climate change allowances in flood risk assessments. The guidance can be found at: www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

KCC require that the drainage design accommodates the 1 in 100 year storm with a 20% allowance for climate change, with an additional analysis undertaken to understand the flooding implication for a greater climate change allowance of 40%.

This analysis must determine if the impacts of the 40% allowance are significant and lead to any unacceptable flood risks (it is not normally expected that the site would not flood in this scenario, only that if this storm were to occur the impacts would be minimal i.e no flooding of property or sensitive infrastructure and no flooding leaves the site). The design may need to be modified to avoid any unacceptable risks, but may also need additional mitigation allowances, for example a higher freeboard on attenuation features or provision of exceedance routes. This will tie into designing for exceedance principles.

Sustainability

Design of drainage systems utilising a sustainable drainage design approach and reducing reliance on below ground systems in pipes and tanks, provides greater visibility for maintenance as well as many other benefits. Sustainable measures which control flow rates near to the source and which maximise natural losses through infiltration and evaporation are preferred. Operation of surface systems is also more easily observed.

Urban Creep

To take account of possible future conversion of permeable surfaces to impermeable over time (e.g. surfacing of front gardens to provide additional parking spaces, extensions to existing buildings, creation of large patio areas). Consideration of urban creep should be assessed for residential developments.

An allowance for the increase of impermeable area from urban creep must be included in the design of the drainage system. The allowances set out in Table 3 must be applied to the impermeable area within the property curtilage according to the proposed dwelling density.

Table 3: impermeable area allowances for urban creep

Residential development density(Dwellings per hectare) (% of impermeable area)	Change allowance
≤ 25	10
30	8
35	6
45	4
≥ 50	2
Flats & Apartments	0

5.2.6 SuDS Policy 6: Sustainable Maintenance

Any proposed drainage schemes must be designed to be maintainable to ensure that that the drainage system continues to operate as designed and must be accompanied with a defined maintenance plan.

The drainage system must be designed to take account of the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work. Without maintenance, the function of drainage systems may alter. Increased leaf litter, sediments and colonisation of vegetation may clog drainage measures or impact the characteristics of operational controls.

Design to be maintainable

The drainage strategy must demonstrate that adequate access is available and practicable for personnel and equipment either through an appropriate layout or legal agreement to provide agreed access arrangements in perpetuity. Consideration should also be given to the Construction Design and Management regulations for health and safety purposes.

Wherever possible, it is preferable that drainage schemes should be designed at the surface to allow easy inspection and maintenance. Drainage maintenance can usually be incorporated as part of a typical landscape maintenance specification.

KCC recommends that shared drainage measures or drainage measures serving the wider development are located within common land or public open space to facilitate easy access and maintenance. Drainage measures which serve more than one property should not be located within back gardens or other private areas.

If the proposed development incorporates existing field ditches or ordinary watercourses, we would normally require a minimum setback of 5 m to 8 m (depending upon the location, and whether the ditch/watercourse falls within an IDB regulated area). This will allow the safe access and operation of any tracked machinery that may be required to undertake any maintenance works to the banks or channels, and provides a reasonable buffer for any flora and fauna within the watercourse.

We would generally recommend that new development is designed to facilitate the maintenance of existing watercourses, with roads or walkways being provided alongside at least one bank for access. Closed fence-lines to the rear of properties bordering a watercourse should be avoided owing to the maintenance difficulties and the potential for the inappropriate depositing of material beyond property boundaries.

With surface water drainage systems, a careful balance must be struck over the creation of habitats. The encouragement of certain protected species or creation of protected habitats may conflict with the regular maintenance works essential to ensuring long term functionality of the drainage measures. An awareness of any biodiversity objectives or site wide strategic ecological management plan should be considered as part of a maintenance plan for the drainage measures, specifically timing of vegetation cuts and silt removal to ensure no conflict with nesting birds or specific life stages of biota.

Where, in particular circumstances, underground techniques are used, more extensive inspection processes will be necessary, for example where longer pipe runs are used, CCTV surveys may be required. All inlet, outlet and control structures must be indicated and known to the appropriate adopting authority to be protected from blockage and located near the surface, to allow for easy management during routine maintenance visits.

Maintenance Plan

An operation and/or maintenance plan should be provided which indicates a schedule and time of activities, as well as critical controls or components of the drainage scheme. This plan should include an indication of the roles and responsibilities for each authority or organisation which may have a responsibility for maintenance activities. Any inter-connectivity with or reliance upon other drainage systems should be indicated.

KCC may work with LPAs to ensure that the drainage schemes associated with large, strategic, potentially problematic or sensitive sites have been established and are able to function in accordance with the approved plans and specifications.

Information on maintenance requirements will be required in early stages of planning submissions to demonstrate that adequate access is provided.

Verification report

KCC may also require the submission of a Verification Report after development completion (Appendix D). This report will demonstrate that the constructed drainage system operates as approved; will include the identification of "critical drainage assets"; and, will outline specific maintenance requirements and obligations for each drainage measure.

As LLFA, KCC has a duty to maintain a register of structures or features which are likely to have a significant effect on flood risk. Drainage schemes within new developments may include structures or features that will be required to be included within the register. Critical drainage assets which are not adopted by others will be recorded.

5.2.7 SuDS Policy 7: Safeguard Water Quality

When designing a surface water management scheme, full consideration must be given to the system's capacity to remove pollutants and to the cleanliness of the water being discharged from the site, irrespective of the receiving system.

Interception of small rainfall events should be incorporated into the design of the drainage system.

Paragraph 170 (e) of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to (or being put at unacceptable risk from) unacceptable levels of water pollution or land instability. Development should whenever possible help improve local environmental conditions.

Additionally, the Water Framework Directive has been established to improve and integrate the way water bodies are managed throughout Europe. It provides a legal framework to protect and restore clean water throughout Europe to ensure its long-term sustainable use. In particular it will help deal with diffuse pollution which remains a big issue following improvements to most point source discharges.

The design of any drainage proposal should therefore ensure that surface water discharges do not adversely impact the water quality of receiving water bodies, both during construction and when operational. Sustainable drainage design principles have the potential to reduce the risk of pollution, particularly through managing the surface water runoff close to the source and on the surface. Below grade pipes and tanks which are efficient for drainage purposes may not provide appropriate water quality treatment.

The CIRIA SuDS Manual describes a methodology for determining the hazard posed by land use activities (refer to Chapter 26 of the CIRIA SuDs Manual). A simple index approach enables an assessment of the pollution hazard and value of mitigation provided by the sustainable drainage measure. This assessment will be required for all applications.

Runoff from small rainfall events can pose a particular problem for water quality. The 'first flush' of runoff contains the initial high concentration load of pollutants that has built-up on surfaces during the preceding dry period. It is possible to get a high initial pollution concentration for relatively small rainfall events.

Rainfall events that are less than or equal to 5mm in depth also comprise more than half of the rainfall events that took place. The volume of runoff from these small events therefore can cumulatively contribute significantly to total pollutant loadings from the site over a specified period of time. Interception of an initial rainfall depth of 5mm for all rainfall events would mimic greenfield response characteristics in that runoff from small rainfall events do not generally produce any run-off.

KCC would expect that developers demonstrate that the first 5mm of any rainfall event can be accommodated and disposed of on-site, rather than being discharged to any receiving watercourse or surface water sewer. This can easily be achieved through the inclusion of sustainable drainage measures such as infiltration systems, rain gardens, bioretention systems, swales, and permeable pavement.

Where it proves exceptionally difficult to achieve this principle, it must be demonstrated that any water leaving the site has been appropriately treated to remove any potential pollutants.

When discharging to the ground, ground conditions and protection of any source protection zones should be confirmed.

Discharge to ground shall only occur within clean, competent, natural and uncontaminated ground and information should be provided to demonstrate that a sufficient unsaturated zone has been provided above the highest occurring groundwater level. Advice may need to be sought from the EA Groundwater team in relation to these matters, particularly in SPZ 1 and may require specific mitigation. Infiltration into Made Ground will not be accepted.

Construction Management Plan

The management and control of erosion and sediment should be considered throughout design and construction, operation and maintenance to ensure that no impact to offsite watercourses occurs.

Sedimentation can cause the loss of aquatic habitat, decreased fishery resources and can lead to increased flooding due to reduction in hydraulic capacity of the watercourse.

A Construction Management Plan will be required to demonstrate that erosion and sediment controls are adequately planned to protect water quality in receiving water environments. Any sites within a sensitive receiving catchment may require additional information. Situations in which this is a consideration will be confirmed through coordination with KCC's Biodiversity team and the Environment Agency.

5.2.8 SuDS Policy 8: Design for Amenity and Multi-Functionality

Drainage design must consider opportunities for inclusion of amenity and multi-functionality objectives and thus provide multi-functional use of open space with appropriate design for drainage measures within the public realm.

Local environmental objectives may identify other benefits which can be agreed to be delivered through appropriate design of the drainage system.

Amenity and Open Space

Where land performs a range of functions it affords a far greater range of social, environmental and economic benefits than might otherwise be delivered (Landscape Institute Position Statement, Green Infrastructure). Open spaces are often multifunctional, fulfilling several different valuable roles; for example, in the main they may be for recreational use, but they may also provide valuable wildlife habitat, an attractive landscape, paths for walking and cycling and space for community events.

Well-designed, open, sustainable drainage measures may also provide this degree of opportunity, optimising all of these functions in a way which fits with the surrounding landscape. For example, park areas which can be used as temporary flood storage during heavy rainfall events, and wetlands being used to deliver amenity value and habitat as well as water treatment. The aim should be to create networks of high quality open space which adapt for attenuation of surface water, sports and play and enhancement of biodiversity.

The integration of sustainable drainage measures into open spaces can introduce open water and variable ground surfaces into the public realm with associated risks of: drowning; slips, trips and falls; waterborne disease; and bird strike if near airports. The majority of potential risks can be assessed and removed through good site design. Reference should be made to best practice for appropriate design is provided in CIRIA's 'SuDS Manual'.

Multi-functional Design Benefits

Multi-functional design may also deliver other benefits as summarised in Table 4 (BS 8582 Code of Practice for Surface Water Management for Development Sites). New evaluation tools (B£ST Benefits Estimation Tool, CIRIA) may enable a full accounting of benefits to demonstrate economies and efficiencies to including specific design elements within the drainage provision. Simple elements such as inclusion of trees, or rain gardens within kerb build-outs may deliver other priorities being sought by the local authority.

Table 4: Multi functional surface water management design (Source: BS 8582:2013)

Infrastructure objective	Multi-functional surface water management system design and associated environmental value
1. Recreational opportunities	• Subsurface attenuation storage systems can be sited below permeable surfaces used for recreation • Infrequently flooded detention zones can also serve as recreational/amenity areas • Vegetated conveyance and/or storage systems can be designed to promote education, play and amenity value • Intensive green roofs can provide amenity landscape in dense urban settings • Surface water management components can be integrated with sustainable transport corridors (e.g. cycle routes) to maximize benefits
2. Water resources conservation	• Surface water run-off from roofs and uncontaminated paved surfaces, can be captured and stored for use • Rainwater harvesting systems can be designed to deliver surface water management benefits in addition to water supply (see BS 8515)
3. Habitats/ biodiversity enhancement	• Vegetated surface water management components, which store or convey water either temporarily or permanently, can often deliver locally important habitat • Such areas can contribute to urban "corridors" and "networks" of green (vegetated) and blue (water) spaces that support the movement of species
4. Traffic management	• Appropriately designed roads can provide, during times of extreme rainfall, short-term effective management of flood waters, either for conveyance or storage • Local road surfaces and pavements can often be designed to be pervious and allow run-off to infiltrate into the sub-base • Bioretention/biofilter zones can be integrated within pavement design to provide both traffic calming and stormwater management units • Vegetated swales running alongside roads can be designed to treat and control road run-off • Tree pits can be included to intercept run-off (with additional subsurface storage included within or adjacent to the pit)

5. Car parking	• Where the car parking surface is designed to be pervious, surface water can be stored and treated within the sub-base, prior to either controlled discharge, infiltration to the ground, or use. • Car parks can store additional volumes of floodwater above the surface during extreme events. • Vegetated strips, swales, bioretention systems and basins can be designed adjacent to the car park to treat and control run-off
6. Public education/ awareness	• Local community engagement strategies can deliver: • an understanding of the functionality and environmental importance of the surface water management system in mitigating human impacts • a commitment towards contributing to the management of the drainage components • an understanding of the health and safety risk management strategy for the site in relation to surface water • ideas as to how the system could be used to promote children's education strategies and increased local amenity benefits
7. Air temperature / urban heat island mitigation	• Urban cooling can be promoted via the return of moisture to the air through evaporation and evapotranspiration from vegetated surface water management features • Direct cooling can be provided by trees integrated within the surface water management system providing shade • Green roofs and vegetative surfaces reflect more sunlight and absorb less heat
8. Reduced energy use	• Green roofs provide good building insulation
9. Air quality improvement	• Trees, larger shrubs and vegetated surfaces used as part of the surface water management strategy can filter out airborne pollutants
10. Landscape character	• Well designed and integrated SuDS features can enhance aesthetic appeal and local landscape and townscape character and distinctiveness
11. Health benefits	• Green and blue space within developments promotes health benefits linked to increased outdoor recreation and a feeling of well being

5.2.9 SuDS Policy 9: Enhance Biodiversity

Drainage design must consider opportunities for biodiversity enhancement, through provision of appropriately designed surface systems, consideration of connectivity to adjacent water bodies or natural habitats, and appropriate planting specification.

Biodiversity is defined as the variety of life on Earth; designing to protect and enhance biodiversity is therefore essential. As a direct result of human activity, the rate of species extinction over the last 200 years is far higher than in any period of the preceding 65 million years[23]. In the UK, freshwater ecosystems are at the most risk and populations of key species have declined significantly.

The NPPF requires that Local Planning Authorities set out a strategic approach to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (NPPF para 171). Maximising the ecological value of drainage systems is consistent with national and local policies which aim to conserve and enhance biodiversity. This is underpinned by a variety of legislation including the biodiversity 'duty' for public bodies which is enshrined in the Natural Environment and Rural Communities (NERC) Act 2006.

Working with the landscape to provide drainage may promote other opportunities with greater benefits for biodiversity but also provide greater attractiveness. The linear nature of many SuDS features can help create green corridors through developments; these are important for wildlife and ensure that the associated development is connected with its surrounding environment.

KCCs 'SuDS and Biodiversity' project (2014) has demonstrated that drainage schemes within residential areas contribute to the biodiversity of the local area and provide important habitats for animals and plants that would otherwise be absent. In some cases invertebrate species of significant nature conservation value have been found.

A number of key factors were identified to strongly influence the biodiversity value of the sustainable drainage features. These included:

- connectivity with other waterbodies and habitats,
- planting assemblage and cover,
- waterbody design,
- retained water,
- fish/wild fowl presence, and
- water quality.

When assessing drainage design, particularly surface systems, it is important to consider the drainage scheme in the context of the surrounding landscape character area. Effective integration will also require carefully researched and selected plants, which work to improve the local green infrastructure.

The design of any drainage scheme can provide an opportunity for increasing biodiversity value by including surface vegetated systems with some retained water and through ensuring appropriate edge treatments and gradients. Review of engineering design by an ecologist may identify simple improvements in pond design and planting specification that would maximise the biodiversity potential.

Glossary

Aquifer	A source of groundwater compromising water-bearing rock, sand or gravel capable of yielding significant quantities of water.
Adopting authority	General term utilized in this guidance and relates to the authority that will ultimately manage the proposed drainage system
Attenuation	Attenuation is the process of water retention on site and slowly releasing it in a controlled discharge to a surface water or combined drain or watercourse. The amount of discharge will vary depending whether it is a brown or greenfield site. For brownfield sites the developer must determine the likely run off and agree an acceptable discharge with the LLFA, environment agency or water authority.
Brownfield site	Any land or site that has been previously developed.
Catchment	The area contributing surface water flow to a point on a drainage or river system.
CIRIA	Construction Industry Research and Information Association. www.ciria.org
Climate change	Long-term variations in global temperature and weather patterns both natural and as a result of human activity (anthropogenic) such as greenhouse gas emissions
Culvert	A structure which fully contains a watercourse as it passes through an embankment or below ground.
Development	The undertaking of building, engineering, mining or other operations in, on, over or under land or the making of any material change in the use of any buildings or other land.
EA	Environment Agency. Government Agency responsible for flooding issues from main river, and strategic overview of flooding.
Flood event	A flooding incident usually in response to severe weather or a combination of flood generating characteristics.
Flood risk	The combination of the flood probability and the magnitude of the potential consequences of the flood event.
Flood Risk Assessment	An appraisal of the flood risks that may affect development or increase flood risk elsewhere
Flood Zones	Flood Zones provide a general indication of flood risk, mainly used for spatial planning.

[23] www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/

Floodplain	An area of land that would naturally flood from a watercourse, an estuary or the sea.
Freeboard	A vertical distance that allows for a margin of safety to account for uncertainties.
Flood and Water Management Act	The Flood and Water Management Act clarifies the legislative framework for managing surface water flood risk in England.
Flow control device	A device used to manage the movement of surface water into and out of an attenuation facility.
Geocellular storage systems	Modular plastic systems with a high void ratio, typically placed below ground which allow for storage of storm water to infiltrate or discharge to another system.
Gravity drainage	Drainage which runs through pipework installed to a fall, and not therefore under pressure.
Greenfield	Undeveloped land.
Greenfield runoff rate	The rate of runoff which would occur from a site that was undeveloped and undisturbed.
Groundwater	Water that exists beneath the ground in underground aquifers and streams.
Groundwater flooding	Flooding caused by groundwater rising and escaping due to sustained periods of higher than average rainfall (years) or a reduction in abstraction for water supply.
Highway Authority	Body responsible for the management and maintenance of public roads
Impermeable	Will not allow water to pass through it.
Impermeable surface	An artificial non-porous surface that generates a surface water runoff after rainfall.
Infiltration	Infiltration or soakaway is the temporary storage of water to allow it to naturally soak away into the ground. Because water soaks into the ground gradually, reduces the risk of flooding downstream. Infiltration may be used where there is no surface water sewer or where existing systems are at full capacity. Infiltration helps to recharge natural ground water levels.

Internal Drainage Board (IDB)	An internal drainage board (IDB) is a public body that manages water levels in an area, known as an internal drainage district, where there is a special need for drainage. IDBs undertake works to reduce flood risk to people and property, and manage water levels for agricultural and environmental needs within their district. There are six IDBs in Kent:
	The River Stour Upper Medway Lower Medway Romney Marshes Area North Kent Marshes
Lead Local Flood Authority	Under the terms of the Flood and Water Management Act 2010, LLFAs are responsible for developing, maintaining and applying a strategy for local flood risk management in their areas and for maintaining a register of flood risk assets. They also have lead responsibility for managing the risk of flooding from surface water, groundwater and ordinary watercourses. Kent County Council are the LLFA within Kent.
Local Flood Risk Management Strategy	Strategy outlining the Lead Local Flood Authority's approach to local flood risk management as well as recording how this approach has been developed and agreed.
Main River	A watercourse designated on a statutory map of Main rivers, maintained by Department for Environment, Food and Rural Affairs (Defra).
Mitigation measure	A generic term used in this guide to refer to an element of development design which may be used to manage flood risk to the development, or to avoid an increase in flood risk elsewhere.
National Planning Policy Framework	Framework setting out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
Overland Flow	Flooding caused by surface water runoff when rainfall intensity exceeds the infiltration capacity of the ground, or when the soil is so saturated that it cannot accept any more water.
Permeability	A measure of the ease with which a fluid can flow through a porous medium. It depends on the physical properties of the medium.

Pitt Review	An independent review of the 2007 summer floods by Sir Michael Pitt, which provided recommendations to improve flood risk management in England.
Rainwater harvesting	Collection and Re-use or recycling of rainwater for the purpose of garden irrigation, car washing, toilet flushing etc.
Runoff	Water flow over the ground surface to the drainage system. This occurs if the ground is impermeable, is saturated or if rainfall is particularly intense.
Source Protection Zone	Defined areas showing the risk of contamination to selected groundwater sources used for public drinking water supply.
Strategic Flood Risk Assessment	A study to examine flood risk issues on a sub-regional scale, typically for a river catchment or local authority area during the preparation of a development plan.
Surface water flooding	Flooding caused by the combination of pluvial flooding, sewer flooding, flooding from open channels and culverted urban watercourses and overland flows from groundwater springs
Surface Water Management Plan	A study undertaken in consultation with key local partners to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term.
SUDS	Sustainable (urban) drainage systems. A sequence of management practices and control structures that are designed to drain surface water in a more sustainable manner.
Watercourse	A term including all rivers, streams, ditches, drains, cuts, culverts, dykes, sluices and passages through which water flows.

Appendix A. National Planning Policy Framework (Extract)

155	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
157	All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.
163	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment[50]. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
165	Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.

170 Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Appendix B. Non-Statutory Technical Standards for Sustainable Drainage

Flood risk outside the development
S1 Where the drainage system discharges to a surface water body that can accommodate uncontrolled surface water discharges without any impact on flood risk from that surface water body (e.g. the sea or a large estuary) the peak flow control standards (S2 and S3 below) and volume control technical standards (S4 and S6 below) need not apply.
Peak flow control
S2 For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rate for the same event.
S3 For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.
Volume control
S4 Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.
S5 Where reasonably practicable, for developments which have been previously developed, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but should never exceed the runoff volume from the development site prior to redevelopment for that event.
S6 Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body in accordance with S4 or S5 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk.
Flood risk within the development
S7 The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 1 in 30 year rainfall event.
S8 The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1 in 100 year rainfall event in any part of: a building (including a basement); or in any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.

S9 The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.

Structural Integrity

S10 Components must be designed to ensure structural integrity of the drainage system and any adjacent structures or infrastructure under anticipated loading conditions over the design life of the development taking into account the requirement for reasonable levels of maintenance.

S11 The materials, including products, components, fittings or naturally occurring materials, which are specified by the designer must be of a suitable nature and quality for their intended use.

Designing for maintenance considerations

S12 Pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

Construction

S13 The mode of construction of any communication with an existing sewer or drainage system just be such that the making of the communication would not be prejudicial to the structural integrity and functionality of the sewerage or drainage system.

S14 Damage to the drainage system resulting from associated construction activities must be minimised and must be rectified before the drainage system is considered to be completed.

Appendix C. Drainage Strategy Summary

1. Site details	
Site/development name	
Address including post code	
Grid reference	E N
LPA reference	
Type of application	Outline ☐ Full ☐ Discharge of Conditions ☐ Other ☐
Site condition	Greenfield ☐ Brownfield ☐

2. Existing drainage			Document/Plan where information is stated:
Total site area (ha)			
Impermeable area (ha)			
Final discharge location	Infiltration ☐ Watercourse ☐ Sewer ☐ Tidal reach/sea ☐		
Greenfield discharge rate (l/s) for existing site area	QBAR (l/s)		
	1 in 1 year (l/s)		
	1 in 30 year (l/s)		
	1 in 100 year (l/s)		
3. Proposed drainage areas			**Document/Plan where information is stated:**
Impermeable area (ha)	Roof		
	Highway/road		
	Other paved areas		
	Total		
Permeable area (ha)	Open space		
	Other permeable areas		
	Total		
Final discharge location	Infiltration ☐ Infiltration rate _____m/s Watercourse ☐ Sewer ☐ Tidal reach/sea ☐		
Climate change allowance included in design	20% ☐ 30% ☐ 40% ☐		

4. Post-Development Discharge rates, without mitigation			**Document/Plan where information is stated:**
Developed discharge rates (l/s)	1 in 1 year		
	1 in 30 year		
	1 in 100 year		
	1 in 100 year + CC		
5. Post-Development Discharge rates, with mitigation			**Document/Plan where information is stated:**
Describe development drainage strategy in general terms:			
(a) No control required, all flows infiltrating ☐			
(b) Controlled developed discharge rates (l/s)	1 in 1 year		
	1 in 30 year		
	1 in 100 year		
	1 in 100 year + CC		
6. Discharge Volumes			**Document/Plan where information is stated:**
	Existing volume (m^3)	Proposed volume (m^3)	
1 in 1 year			
1 in 30 year			
1 in 100 year			
1 in 100 year + CC			

All information presented above should be contained within the attached Flood Risk Assessment, Drainage Strategy or Statement and be substantiated through plans and appropriate calculations.

Form completed by	
Qualifications	
Company	
Telephone	
Email	
On behalf of (client's details)	
Date	

Appendix D. Drainage Asset Record Sheet for Verification Report

IDENTIFICATION	Type of Structure or Feature	
	Location Name	
	Drawing Identifier	
MANAGEMENT/ OWNERSHIP	Owners Name / Company	
	Address of owner	
	Owners Contact Number	
	Maintained By	
	Adoption proposed	☐ YES ☐ NO
	Name of Adopting Authority	
	Estimated Date of Adoption	
ASSET DETAILS	National Grid Reference (NGR)	
	Cover Level	
	Invert Level	
	Max volume	
	Height	
	Diameter/Width	
	Length	
	Depth	
	Designed Flow Rate	
	Any Additional Uses	