

**REPORT SUMMARY**

<b>REFERENCE NUMBER:</b> 24/502907/FULL		
<b>APPLICATION PROPOSAL:</b> Formation of hardstanding for HGV parking and erection of shower block extension to amenity building, alongside the reconfiguration of existing coach parking and retaining wall and associated acoustic fencing, lighting, and CCTV.		
<b>ADDRESS:</b> M20 Service Station, Junction 8, Maidstone, Kent, ME17 1SS		
<b>RECOMMENDATION:</b> Grant planning permission subject to s106 legal agreement and conditions		
<b>SUMMARY OF REASONS FOR RECOMMENDATION:</b> Local Plan Review policies LPRSP11, LPRSP11(A), and LPRCD6 seek to support the sustainable growth and expansion of existing businesses within the countryside subject to certain criteria; and in this respect the proposal would not be seen as a departure from the Local Plan Review.		
<p>The proposed development would not be unacceptable in terms of its impact upon the character and appearance of the area, and there are no objections raised in terms of arboriculture; biodiversity; highway safety; flood risk and surface water drainage; archaeology; and all other planning respects.</p> <p>The submission has demonstrated that the development would deliver more than 10% BNG; and a condition will secure a Habitat Management and Monitoring Plan for maintaining the minimum 10% onsite BNG for a period of 30yrs from the completion of the development. A fee to cover the long-term monitoring for BNG will be secured by way of a legal agreement.</p> <p>Strong weight is also given to National Highways offering no objection and they confirm that should the local planning authority not propose to determine the application in accordance with this recommendation, it will be necessary to consult the Secretary of State for Transport (as set out in Town and Country Planning (Development Affecting Trunk Roads) Direction 2018), and the application may not be determined until this process is complete.</p>		
<b>REASON FOR REFERRAL TO COMMITTEE:</b> Harrietsham Parish Council have requested for application to be considered by Planning Committee if officers are minded to recommend approval. This request is made for reasons outlined in consultation section below.		
<b>WARD:</b> Harrietsham, Lenham & North Downs	<b>PARISH:</b> Hollingbourne	<b>APPLICANT:</b> Mrs D. Taylor <b>AGENT:</b> Astrum Planning Ltd
<b>CASE OFFICER:</b> Kate Altieri	<b>VALID DATE:</b> 26/07/24	<b>DECISION DUE:</b> 31/01/25
<b>ADVERTISED AS A DEPARTURE:</b> Yes – but no longer relevant (see paragraph 6.04 of report)		

**RELEVANT PLANNING HISTORY**

There are numerous planning applications for the site including:

- 24/502056 - Screening Opinion: Formation of hardstanding for HGV parking, and extension of amenity building, alongside reconfiguration of parking and associated works – EIA not required
- 23/504117 – Pre-app: Extension to HGV parking area
- 23/502540 - Installation of EV charging points, erection of canopy with solar panels over parking bays and erection of EV equipment container- Approved
- 22/504432 - Demolition of ATM and part of entrance, erection of single storey side extension to restaurant & new drive thru lane with associated car parking (resub of 22/502925) - Approved
- 21/504528 – Removal of 6 antennas and replacement with 3 antennas and associated ancillary supporting development works – No further action required
- 19/501336 – MMA to 18/500959 – Approved
- 18/506611 – NMA to 18/500959: 1) No demolition of patio and create 4 parking bays; 2) Inclusion of 2.5m hit and miss fencing surrounding electrical hardware - Refused
- 18/506238 - Proposed new extension to side elevation – Approved

- 17/500485 – Construction of drive through kiosk and associated roadways - Approved
- MA/98/0256 - Extension to existing lodge - Approved
- MA/96/1188 - Revised design of amenity building - Approved
- MA/95/0136 - Erection of Motorway Service Area - Approved
- There are also many advert consent applications.

## **MAIN REPORT**

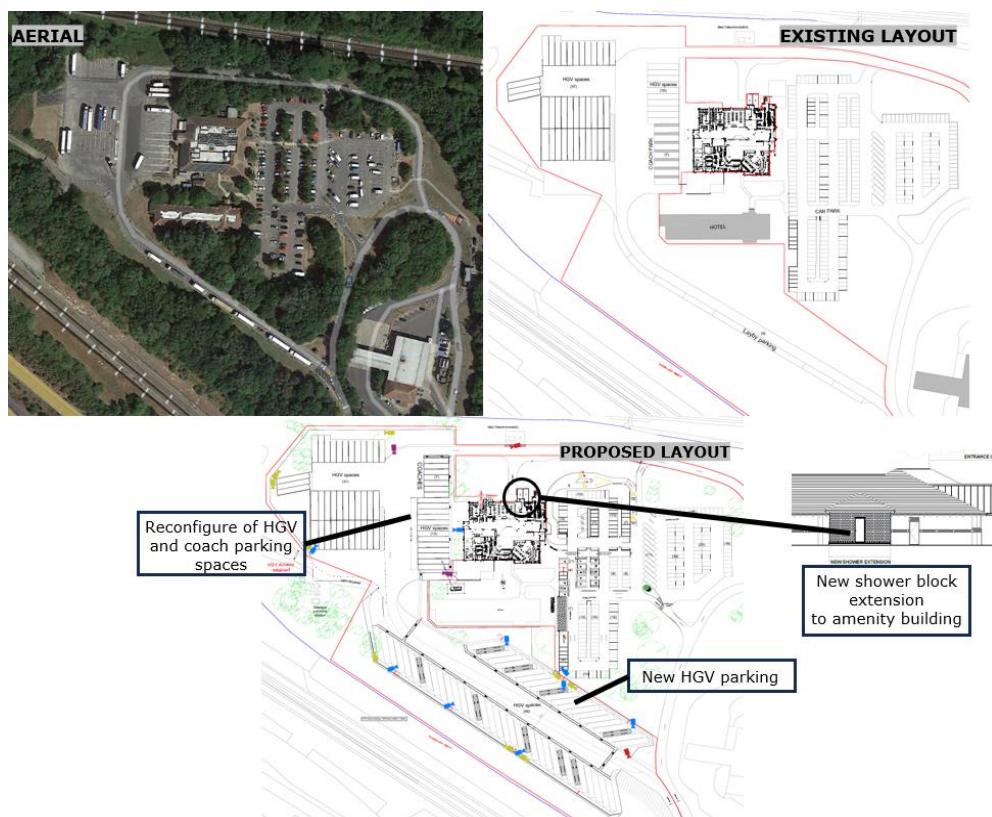
### **1.0 SITE DESCRIPTION**

1.01 The application site relates to the Roadchef Service Station at junction 8 of the M20. There are public rights of way in the locality of the site, including a public footpath (KH132A) that runs around the eastern boundary of the service station, heading in a general north direction; the woodland to the north of site, beyond the railway line, is designated Ancient Woodland protected under TPO no. 10 of 1983 as well as a Local Wildlife Site (Snarkhurst Wood); and to the south of the site is the Channel Tunnel Rail Link and the M20 itself. For the purposes of the Local Plan Review, the site is within the designated countryside and within the setting of the Kent Downs National Landscape. The site is also within Flood Zone 1 and a Groundwater Source Protection Zone; a KCC Mineral Safeguarding Area; and an area of archaeological potential.

### **2.0 PROPOSAL**

2.01 This application is described as: *Formation of hardstanding for HGV parking and erection of shower block extension to amenity building, alongside the reconfiguration of existing coach parking and retaining wall and associated acoustic fencing, lighting, and CCTV.*

2.02 The plan extracts below help illustrate the proposed development:



2.03 The proposal would increase the number of HGV spaces onsite from 55 to 106 spaces (an uplift of 51 spaces).

### 3.0 POLICY AND OTHER CONSIDERATIONS

- Maidstone Borough Local Plan Review (2021-2038)
- Landscape Character Assessment (2012 amended July 2013) & Capacity Study
- Kent Downs AONB Management Plan 2021-2026 (Third Revision)
- National Planning Policy Framework (2023) & National Planning Practice Guidance
- 99 of Government Circular (ODPM 06/2005) Biodiversity and Geological Conservation - Statutory Obligations & Their Impact Within the Planning System
- Natural England and Forestry Commission Standing Advice
- Levelling-Up and Regeneration Act 2023
- Countryside and Rights of Way Act 2000

3.01 **Local Plan Review (LPR):** The LPR was adopted by the Council in March 2024 and this document attracts full weight. Relevant policies for this application are considered to be: LPRSS1 (Spatial strategy); LPRSP9 (Development in countryside); LPRSP11 (Economic development); LPRSP11(A) (Safeguarding employment sites); LPRSP12 (Sustainable transport); LPRSP14(A) (Natural environment); LPRSP14(B) (Historic environment); LPRSP14(C) (Climate change); LPRSP15 (Design); LPRCD6 (Expansion of existing businesses in rural area); LPRTRA1 (Air quality); LPRTRA2 (Assessing transport impacts); LPRTRA4 (Parking); LPRENV1 (Development effecting heritage assets); LPRQD1 (Sustainable design); LPRQD2 (External lighting); LPRQD4 (Design principles in countryside).

3.02 **Landscape Character Assessment:** The Landscape Character Assessment (LCA) identifies the site as falling within the Gault Clay Vale, Eyhorne Vale Landscape LCA (Area 15). The landscape guidelines for this area are to 'CONSERVE' and a summary of actions are as follows:

- *Conserve undeveloped foreground and rural setting of Kent Downs AONB*
- *Conserve characteristic oak, ash and beech hedgerow trees and isolated oaks in arable land, and plant new hedgerow trees and isolated specimens to replace ageing examples*
- *Avoid infill development and expansion across the downland at Harrietsham and Hollingbourne*

3.03 The Council's Capacity Study for this LCA concludes: *North of railway line, the landscape is situated within the Kent Downs AONB. The Kent Downs AONB is a nationally important designation which offers a high level of development constraint. The area is sensitive to change. Development should be limited to infill within the village boundaries.*

3.04 **NPPF:** The NPPF is clear that good design is a key aspect of sustainable development and permission should be refused for development that is not well designed, with section 12 of the NPPF referring to 'achieving well-designed and beautiful places'; and paragraph 182 requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Section 16 also relates to the historic environment.

3.05 **National Landscapes:** In November 2023, all Areas of Outstanding Beauty in England and Wales became 'National Landscapes'. Accordingly, it is now the Kent Downs National Landscape.

3.06 Section 85 of the Countryside and Rights of Way Act 2000, as amended by the Levelling Up Act 2023, requires local authorities: *'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority.....must seek to further the purpose of conserving and enhancing the natural beauty of the AONB'.*

3.07 The Kent Downs AONB Management Plan does not form part of the Development Plan, but the Council has adopted it and it is a material consideration when assessing any planning application.

### 4.0 LOCAL REPRESENTATIONS

4.01 **Local residents:** 1 representation of support has been received from the Road Haulage Association, who represent represents more than 8,500 members who operate more than half of the UK HGV fleet (as well as coach operators and van users).

## 5.0 CONSULTATION RESPONSES

(Please note summaries of consultation responses are set out below; and comments are discussed in more detail in the appraisal section where considered necessary)

5.01 **Hollingbourne Parish Council:** Wish to see application refused and reported to Planning Committee if officers are minded to recommend approval. In summary, they comment:

*Parish Councillors were divided in their opinion of application (4 object & 2 do not wish to object):*

- *Location: Although there is need for extra parking for haulage, it wasn't felt J8, at base of North Kent Downs, with proximity to Hollingbourne, makes this a suitable location. PC has requested for some years that pathway fence is repaired and alerted services to fact drivers are using outside area as toilet. Lack of action means fences have been left broken for years. Beyond fence is a public footpath that is now regularly used by Customers of Roadchef as a toilet, leaving members of public to navigate a path through human waste. It is considered further expansion of site is inappropriate as Roadchef demonstrate today by lack of basic maintenance of site perimeter, despite assurances matters will be resolved, and responsibilities as a landowner for good of amenity of adjacent environment are not of sufficient priority.*

- *Noise/Light pollution: Loss of trees along M20 boundary will lead to further noise pollution for Hollingbourne from M20, there will also be a loss of a continued green corridor for wildlife, it will also make area look a lot more industrialised whereas currently services as shielded by a green canopy, in addition to this there will be more light pollution.*

- *Potential increase of crime: Site is a motorway service station not a lorry park. Having this facility in our village drastically increases our crime statistics as most of it is committed at J8 services. Most crimes relate to parked HGV's. This has direct impact on our Insurance premiums. Service station is used by members of public, it is a stop off point for groups of children heading off on school trips. I do not feel it is appropriate for showering and parking facilities to be provided alongside alcohol they are selling to drivers.*

5.02 **MBC Landscape Officer:** Raises no objection (see main report).

5.03 **MBC Tree Officer:** No arboricultural objections are raised (see main report).

5.04 **KCC Highways:** Have raised no objection (see main report).

5.05 **Environmental Protection Team:** Have raised on objection (see main report).

5.06 **KCC Biodiversity Officer:** Have raised on objection (see main report).

5.07 **KCC Drainage:** Have raised no objection (see main report).

5.08 **KCC Archaeology:** Raise no objection (see main report).

5.09 **KCC Minerals Safeguarding:** Confirm they have no land-won minerals or waste management capacity safeguarding objections or comments to make regarding application.

5.10 **National Highways:** Offer no objection (see main report) and state: *Should LPA not propose to determine application in accordance with this recommendation they are required to consult Secretary of State for Transport, as set out in Town and Country Planning (Development Affecting Trunk Roads) Direction 2018 and may not determine application until this process is complete.*

5.11 **Environment Agency:** Raise no objection (see main report).

5.12 **Natural England:** Raises no objection.

5.13 **Kent Police:** Have reviewed application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with NPPF (see main report).

5.14 **Kent Downs National Landscape Team:** With agreed protocol, they have a limited land use planning role, prioritising its involvement to planning policy and will not normally provide bespoke comments on applications such as this. This does not imply support nor objection.

5.15 **UK Power Networks:** Neither objects nor supports application (see main report).

5.16 **Southern Water:** Raise no specific objection to proposed development.

- 5.17 **Upper Medway Internal Drainage Board:** No representations have been received and it is therefore assumed they have no objections to the proposal and require no further information.
- 5.18 **Kent Wildlife Trust:** No representations have been received and it is therefore assumed they have no objections to the proposal and require no further information.
- 5.19 **Scotland Gas:** No representations have been received and it is therefore assumed they have no objections to the proposal and require no further information.

## 6.0 APPRAISAL

6.01 The key issues for consideration therefore relate to:

- Principle of development;
- Impact upon character and appearance of area;
- Arboricultural implications;
- Highway safety implications;
- Biodiversity implications;
- Flood risk/surface water and foul drainage;
- Heritage/archaeology implications; and
- Other planning matters.

6.02 The details of the submission will now be considered.

### Principle of development

6.03 Please note the following policy extracts:

Policy LPRSP11 states (inter alia):

*Council is committed to supporting and improving the economy of borough and providing for needs of businesses. This will be achieved through allocation of a range of sites across borough.....and through: (8) Supporting proposals for expansion of existing economic development premises in countryside....., provided scale and impact of development is appropriate for its countryside location, in accordance with LPRCD6.*

Policy LPRSP11(A) states (inter alia):

*5. Elsewhere, outside of allocations or Economic Development Areas, applications seeking alternative use of employment land/premises will only be supported where proposal: (a) Would help meet an identified need; (b) Would not undermine key economic sites or vitality and viability of town centres, and is compatible with other policies in framework; and (c) Complies with all other relevant development plan policies.*

Policy LPRCD6 states (inter alia):

*1. Permission will be granted for sustainable growth and expansion of rural businesses in countryside where:*  
*i. New buildings and proposed access thereto are appropriate in scale and provided resultant development as a whole is appropriate in scale for location and can be satisfactorily integrated into local landscape;*  
*ii. Increase in floorspace would not result in unacceptable traffic levels or types on nearby roads or a significant increase in use of an existing substandard access;*  
*iii. Development, together with existing facilities, will not result in unacceptable impact on amenity of area. In particular, impact on nearby properties and appearance from public roads will be of importance; and*  
*iv. No open storage of materials will be permitted unless adequately screened from public view all year.*

6.04 This application had been advertised as a departure from the Local Plan Review, and whilst the merits/details of the proposal will be discussed further on in this report, it is now considered that the principle of the development would be acceptable as Local Plan Review policies seek to support the sustainable growth and expansion of existing businesses within the countryside.

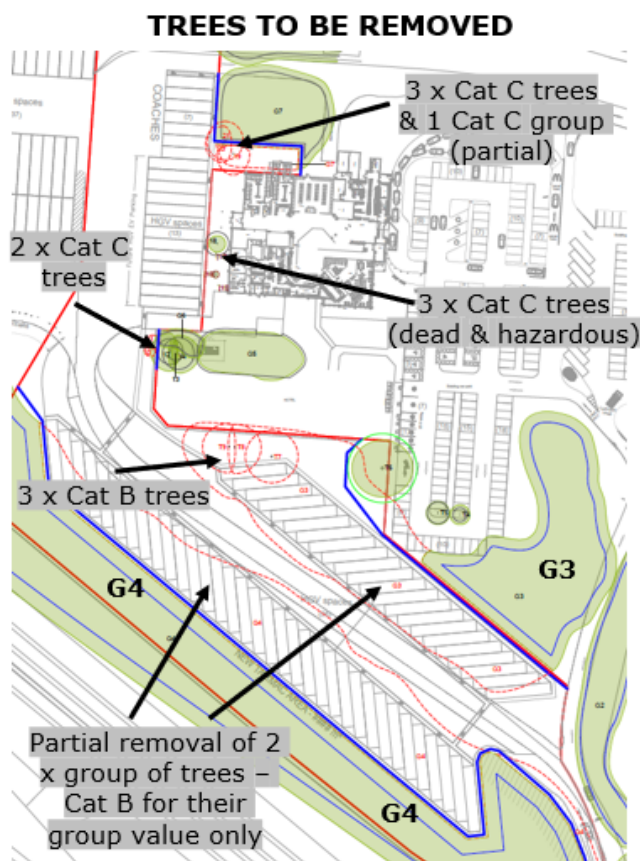
6.05 It is also considered important to give weight to the National Highways standing advice that states (in summary): *Climate Change Committee's 2022 Report to Parliament notes that for UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise appropriate opportunities to promote walking, cycling and public transport should be taken up. Moreover, build clever and build efficiently criteria, as set out in clause 6.1.4 of PAS2080 (a global standard for managing infrastructure carbon, as authored to meet World*

*Trade Organization requirements), promotes use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption. These considerations should be weighed alongside any relevant local policies to ensure that planning decisions are in line with necessary transition to net zero carbon.*

6.06 With this considered the view is taken that the principle for the proposal is acceptable, and would not be a departure from the Local Plan Review. The submission details will now be assessed.

**Impact upon character and appearance of area**

6.07 The proposed development would see the loss of a number of trees and the submission is accompanied by an Arboricultural Impact Assessment (AIA). In summary, the development would see the loss of the following:

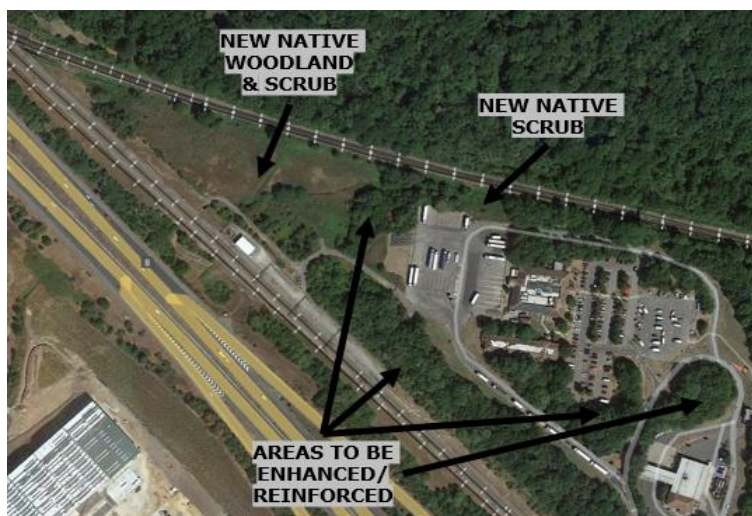


The AIA states: *The trees within G3 and G4 offer little in way of individual merit - Category B is afforded to groups by virtue of their collective interest as opposed to any individual quality or arboricultural significance (i.e. trees are present in numbers and attract higher rating than they would as individuals).*

6.08 The Council’s Landscape Officer has reviewed the submission and raised no arboricultural objections to the proposal. In summary, they have commented as follows:

*I have no arb objections. However it should be ensured that any loss of trees should be mitigated with replanting of new native trees and shrubs with an appropriate size and stature (can be subject to condition) that will result in no net loss of canopy cover, provide biodiversity gain in future and to ensure there is no overall loss of wider amenity upon completion of development (as mentioned in submitted AIA). Use of arb protection should be monitored throughout development process by specialist.*

6.09 The proposal will see the creation of a new woodland area in the north-western corner of the wider site; the creation of native scrub along the northern boundary and around the new woodland; and the enhancement/reinforcement of existing areas of trees:



- 6.10 It is acknowledged that the proposal will see the loss of a number of trees and valued groups of trees. However, these trees are not protected; it is accepted that there is a clear need for the level of HGV parking shown in this location; the development would retain a soft buffer of enhanced woodland between the service station and the M20; and it is considered that the submission shows a good level of new (native) planting to compensate for the loss of existing landscaping, and the Council's Landscape Officer is also satisfied with the new planting scheme shown. The proposed landscaping scheme will be secured by way of condition along with the require requirement to submit a longterm management plan for the proposed planting on the site.
- 6.11 Further to this, the Council's Landscape Officer has considered the submitted Arboricultural Method Statement (that includes tree protection details) to be acceptable, and is satisfied that a condition can be added to ensure the development is carried out in accordance with the methodology set out within it.
- 6.12 The view is therefore taken that the scheme would not be objectionable in arboricultural terms and the proposed compensation would ensure that the proposal would not have a long-term negative impact on the amenity of the site.
- 6.13 The reconfiguration of the existing parking area would largely involve the remarking of existing hardsurfacing; and the proposed shower block would be a modest addition to the main service station building. These elements of the scheme would be very much read in the context of the existing site and would also cause no landscape harm. Further to this, the short stretch of 4m high acoustic fencing that would enclose the southern boundary of the existing hotel; the metal mesh security fencing (at 1.8m and 2.4m high in different places); and the new lighting and CCTV apparatus, would be very much read in the context of the motorway service station without causing unacceptable harm to surrounding countryside, whilst providing obvious noise attenuation and security benefits.
- 6.14 In terms of potential wider landscape impacts, the existing site is considered to be well contained and largely screened from public view, with the most prominent view of it being at short range from the internal road network within the site; and potential glimpses of the HGV parking from the public footpath (KH132A) that runs along the eastern boundary of the site.

6.15 The submission is accompanied by a Landscape and Visual Impact Assessment (LVIA) that concludes (in summary):

*There will be no change to landscape character or to setting of Kent Downs National Landscape (NL) and no significant level of visual impact due to development. Minor adverse impact as a result of proposal has been identified only to south of existing MSA (within site) and no adverse impact will occur to north and in NL. Proposal will not have detrimental effect on setting or views from Kent Downs National Landscape.*

*Study area has distinctive and significant vegetation cover including woodland, hedgerows and hedgerow trees which play vital role in screening and assimilating man-made elements into existing topography, thereby reducing their potential negative impact on the landscape character.*

*Landscape character falls into two categories: Impact of site itself within road transport network and impact on surrounding area within study area.*

*- Application Site: Assessed there will not be a significant detrimental level of change in landscape character on application site. Current land-use of site has low sensitivity to development. Proposal extends current parking areas in existing MSA and infrastructure which will be contained within existing site boundary.*

*- Wider landscape: There will be no significant detrimental level of change in landscape character in study area as result of proposal. Assessment recognises site is located in sensitive location in immediate setting of Kent Downs NL. However, effect of proposal is low level due to size & nature of proposal in existing facility. Existing vegetation around MSA & wider landscape effectively screens site & this will not change. MSA, with HGV parking extension, will remain well-screened & assimilated into landscape.*

*Visual envelope around application site is contained to north by local landform of Kent Downs and local rising land on southern side of River Len valley. Potential visual impact within visual envelope from proposed development for receptors (residential areas, PRoW) is limited to a minor level of negative impact from south of M20. Existing views to north are dominated by range of man-made features including M20, A20 and HS1 transport corridor with associated infrastructure and Woodcut Farm Business Park. These elements are visual and audible detractors in foreground of views towards Kent Downs. From certain views there may be a slight increase in visibility of HGVs in parking extension area on southern boundary of MSA due to removal of a portion of existing vegetation. Proposed enhancement planting will reinforce existing vegetation further along this boundary. Planting outside site along HS1 will also mature adding another layer of screening.*

*There will be no visual impact within Kent Downs NL or on any receptors to north of M20. Existing MSA is not visible in landscape due to significant woodland cover which effectively screens and assimilates major transport corridor into countryside including MSA. Visual impact assessment has established there is limited visual impact of a minor nature and therefore there is no significant visual impact as a result of proposal.*

*Conclusion: LVIA demonstrates proposal will not result in any significant level of detrimental harm to landscape character, views or visual amenity in surrounding area & proposal is not contrary to NPPF or LPR.*

6.16 The Council's Landscape Officer raises no objection to the conclusion and methodology of the submitted LVIA and comment (in summary): *LVIA provides thorough insight into potential visual impact that proposal will have on Kent Downs NL with photographic evidence showing site from designated viewpoints. Report was undertaken within winter period and in effect outlines a worst-case scenario and demonstrates minor visual impact would be south of M20, however, this would be mitigated by proposed planting. Report methodology conforms to principles laid out in Guidelines for Landscape and Visual Impact Assessment Third Edition GLVIA3.*

6.17 There is no justified reason to go against this view and when judging the context of the development within an existing motorway service, together with the limited public views of the development and the proposed landscaping mitigation, the view is taken that the proposal would not affect the setting of the Kent Downs National Landscape; and it would not cause significant harm to the character and appearance of the countryside hereabouts, in accordance with policies LPRSP9; LPRSP11; LPRSP14(A); LPRSP15; LPRCD6; and LPRQD4.



## Highway safety implications

6.18 The submitted Transport Statement concludes as follows (in summary):

- Proposal will not impact flow of traffic from M20, into MSA or back to motorway.
- Swept path analysis demonstrates vehicles are able to appropriately access/depart HGV spaces forwards.
- Proposal will deliver needed HGV parking here, as supported by parking beat survey which demonstrated existing parking was operating at occupancy rate of 155% at its peak. Additional provision will allow HGV parking area to operate within capacity and to avoid need for HGVs to circulate to find a space. Proposal will also accommodate any existing suppressed demand for parking that cannot be achieved at present.
- Existing number of car parking spaces will be unchanged and is able to comfortably accommodate existing level of parking demand, which will not change as a result of development. A parking beat survey demonstrated existing occupancy of 48% in car park.
- Development is not expected to significantly increase number of vehicles accessing or departing MSA and therefore will have no considerable effects on M20 Junction 8, or operation of M20. Traffic flows on M20 will be unchanged, whilst traffic flows on slip roads may be slightly increased as a result of development, primarily as a result of release of suppressed HGV parking demand.
- MPPF paragraph 115 states: 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on road network would be severe.' Evidence provided in this report has shown proposal will not have a severe impact on highway safety, or operation of highway network and therefore considered acceptable in highway terms.

6.19 National Highways have raised no objection to the proposal and have commented (in summary):

*We are concerned with proposals that have potential to impact on safe and efficient operation of Strategic Road Network (SRN), particularly within vicinity of M20. Roadside facilities such as Motorway Service Areas (MSAs) play important role in supporting safety and welfare of road users, included HGV drivers, and provide opportunities for drivers to stop and take a break. Freight facilities enable drivers of HGVs to comply with relevant regimes of statutory breaks and other working time restrictions. This is recognised in national policy "Strategic road network and delivery of sustainable development" (Circular 01/2022, Dec 2022).*

*Circular 01/2022 also recognises need for expansion of existing facilities on or near to SRN where there is a shortage. National Survey of Lorry Parking (Department for Transport, Sept 2022) found utilisation of on-site parking facilities in South East has reached a critical level. National Highways' Lorry Parking Demand Assessment (Sept 2023) identifies Maidstone borough is experiencing high lorry parking issues. Proposal conforms with these national policy objectives by providing an additional 51 HGV parking spaces in limits of existing MSA, as well as a shower block extension alongside reconfiguration of existing coach parking. HGV parking would be provided on both sides of access road where currently lay-by parking is present. Proposal would significantly boost HGV parking provision at MSA adjacent to SRN in area where there are identified lorry parking issues. Proposal would not have material impact on M20 Junction 8.*

*Having assessed application we are satisfied development would not have an unacceptable impact on safety, reliability, and/or operational efficiency of the SRN.*

6.20 It is also noted that KCC Highways have raised no objection to the proposal. With all of the above considered, no objections are raised to the proposal in highway safety terms and the proposal would accord with policy LPRSP15 and NPPF paragraph 115.

## Biodiversity implications

6.21 The KCC Biodiversity Officer has reviewed the ecological details that accompany this application and advise that the submission has provided a good understanding of ecological interest of site

### Protected species

6.22 The KCC Biodiversity Officer comments (in summary): *Submission has confirmed site is being used by commuting/foraging common pipistrelle and there is suitable habitat within site for roosting bats and breeding birds. We are satisfied it is currently unlikely bats are roosting in buildings or trees to be impacted and therefore no detailed mitigation strategy is required. We highlight if proposed works are not carried out within 24 months of bat emergence survey a review and, if necessary update of surveys must be carried out. Due to suitable habitat being present we advise a precautionary mitigation approach is required to ensure breeding birds are not impacted by proposal. We recommend condition for protected/notable species mitigation requirements. In the short term, site will result in a loss of habitat for the species present within site however vegetation clearance will not result in a loss of connectivity through site and*

*proposed habitat creation works (if managed appropriately) will increase foraging, commuting and roosting/nesting opportunities.*

- 6.23 The recommended conditions relating to the timing of the bat emergence surveys and the precautionary mitigation approach are considered reasonable to safeguard protected species; and it is accepted that no other protected species are likely to be adversely impacted upon as a result of this development. On this matter, the scheme would therefore accord with Local Plan Review policies LPRSP14 and LPRSP15; 99 of Government Circular (ODPM 06/2005) Biodiversity and Geological Conservation - Statutory Obligations & Their Impact Within the Planning System; and the aims of the NPPF.

#### Lighting

- 6.24 The KCC Biodiversity Officer comments (in summary): *Proposal will result in increase in lighting in site, in particular within location of proposed HGV parking. We acknowledge that due to type of development there will be a need for lighting but recommend it is designed to minimise light spill on to retained/proposed habitats. If granted we recommend a lighting condition.*
- 6.25 On the basis of this advice, no objections are raised to the proposal in terms of potential impacts upon bats subject to a condition seeking details of how the scheme would accord with the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'.

#### Biodiversity Net Gain (BNG)

- 6.26 The KCC Biodiversity Officer comments (in summary): *A BNG assessment has been submitted and it details BNG of over 10% (being 10.29%) can be achieved through habitat creation in applicants landholdings; and submission includes everything which is required as part of BNG requirements. Applicant should submit a biodiversity gain plan form along with supporting info once granted permission to demonstrate in more detail how proposed BNG will be delivered. Proposal will result in loss of area of plantation woodland and to achieve a BNG, application is proposing to create woodland in west of site. On review of submission it is our view habitat creation proposed is achievable if it is established and managed appropriately in long term. In addition to creation of additional areas of woodland we highlight proposal will also actively managed areas of retained woodland within site. To achieve this we advise the need for an ecological management plan to be produced and highlight it must manage all habitats within site. We have specifically stated this as application submitted metric details that it intends to enhance condition of some of the retained habitats such as the pond or retained areas of woodland in redline boundary area. Regardless of whether metric shows condition of retained habitats will be improved there will be need for habitats within site to be managed. Due to need for management to be implemented we recommend a management plan is included as condition.*
- 6.27 On the basis of this advice, it is accepted that the submission has demonstrated that the development would deliver more than 10% BNG; and a fee to cover the long-term monitoring for BNG will be secured by way of a legal agreement.
- 6.28 It is also considered reasonable to secure an EMP by way of condition to ensure that all of the new planting across the whole site (and not just what is relevant to BNG) is established and managed appropriately in the long term; that existing woodland is actively managed appropriately; and that all habitats within the site are suitably managed. This pre-commencement condition has been agreed by the agent.
- 6.29 Local Plan Review policy LPRSP14(A) is not relevant here, in terms of the need to deliver a minimum 20% BNG as the development is not for new residential development.

#### Biodiversity enhancements

- 6.30 One of the principles of Local Plan Review policies and the NPPF is for there to be the opportunity to improve biodiversity in and around developments that is integrated as part of the design. Notwithstanding the above details regarding woodland/scrub planting and existing woodland management, the submission also details that bird and bat boxes will be fixed to suitable trees. A condition is therefore also recommended to secure these enhancements, in accordance with policy LPRQD1 and the aims of the NPPF.

### **Flood risk/surface water and foul drainage**

- 6.31 After further information was initially requested by KCC, as the lead local flooding authority, in terms of surface water drainage they now raise no objections and comment (in summary):

*On review of additional info (from Baxter Glaysher Consulting's letter of 25/09/24) and the strategic context this has provided, we have been able to review calculations against our policy and are now happy to recommend approval with conditions.*

*Advisory comments:*

- In line with NPPF paragraph 175 we prefer use of multifunctional soft SuDS over harder engineered solutions. Noting industrial nature of this site and need for full retention separators, we acknowledge opportunity for these may be limited. Where possible, detailed design should seek to introduce soft measures as part of the overall SuDS proposals.*
- Detailed design should apply relevant climate change allowance to 1 in 30 year return period event as well as 1 in 100 year, and present simulation results as critical by max level.*

- 6.32 There is no evidence nor reason to go against KCC's comments and the recommended conditions for a detailed sustainable surface water drainage scheme and a Verification Report, pertaining to the surface water drainage system, are considered reasonable and necessary in planning terms. The condition requesting a detailed sustainable surface water drainage scheme is a pre-commencement condition and its imposition has been agreed by the agent (amended to relate to the phasing of the proposed development). The advisory comments from KCC will also be added as an informative.

- 6.33 Further to this, the Environment Agency have raised no objection and set out a number of informatives that will be duly added. In addition to this, whilst the site is Flood Zone 1, it is a groundwater protection zone and a condition will be imposed to restrict piling or any other foundation designs using penetrative methods. Such a condition is considered reasonable in accordance with Local Plan Review policy LPRSP14(A) and the NPPF, to ensure the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants.

- 6.34 As a response to queries raised by Southern Water the agent confirms (in summary):

*Foul Sewer: There are no new sewer connections associated with proposal and any foul drainage alterations linked to amenity building will utilise existing foul water drainage system.*

*Surface Water: Trap gullies and petrol interceptors are included in design to deal with potential risk of oil spillages from new hardsurfacing; and interceptors are placed prior to attenuation tanks linked to existing surface water system. Design of the surface water scheme for proposal has taken account of surface water hierarchy reflected in part H3 of Building Regs. Surface water flow from new hard areas have controlled discharge connected to existing surface water drainage system and final discharge arrangement. There is no groundwater and/or land drainage linked to public sewerage network.*

- 6.35 This response is considered to adequately address the matters raised by Southern Water regarding the proposal and surface water management of the site.

- 6.36 With everything considered, the view is therefore taken that the proposal would accord with policies LPRSP14(A) and LPRSP14(A), when they seek proposals to mitigate against adverse impacts on Groundwater Source Protection Zones; to show the accommodation of suitable wastewater treatment; and to have regard to surface water management.

### **Heritage/archaeology implications**

- 6.37 The application site lies on site of multi-period activity, particularly a Bronze Age settlement that was located during archaeological investigations for the service station itself, where part of the Bronze Age site was excavated and part preserved in situ. KCC Archaeology also acknowledges there is the potential for remains for the later prehistoric period onwards.

- 6.38 At the request of KCC, an amended Archaeological Desk-Based Assessment (Nov 2024) accompanies the submission. On review of this document KCC Archaeology comment (in summary):

*Applicant has submitted an acceptable DBA which sets out main archaeological issues and this is very welcome. I still have concerns over negative impact on setting of Bronze Age settlement and I note there will be some negative direct impact on Bronze Age remains. I consider applicant has now addressed paragraph 200 NPPF (2023) and reasonable archaeological assessment has been submitted. Applicant has submitted more info on potential impact of proposal and there will be some harm to Bronze Age settlement and its setting. However, in view of remains being non-designated, mitigation can be secured by conditions to reduce this negative impact. I therefore recommend conditions for securing archaeological field evaluation works; the implementation and completion of a programme of archaeological post excavation and publication work.; and the implementation of a programme of heritage interpretation.*

- 6.39 On balance, it is considered that the use of the recommended conditions is a suitable way forward in this instance and the conditions are considered reasonable and necessary, to ensure that features of archaeological interest are properly examined and recorded and that due regard is had to the preservation in situ of important archaeological remains; to ensure that the results of the archaeological investigation are properly assessed and disseminated; and to ensure community and visitor awareness, understanding and enjoyment of the heritage. The condition securing archaeological field evaluation works is a pre-commencement condition and its imposition has been agreed by the agent.
- 6.40 The proposal would not affect the setting or significance of any other heritage asset.

#### **Other planning matters**

- 6.41 The proposed works would be more than 15m from protected Ancient Woodland that lies beyond the railway line to the north of the site, and would therefore not have a harmful impact upon this designated woodland that is also a Local Wildlife Site. The KCC Biodiversity Officer is also satisfied that the proposal is unlikely to have a harmful impact upon the Ancient Woodland in terms of noise and lighting.
- 6.42 The proposal would not have an adverse impact upon the living conditions of any local resident when trying to enjoy their own property, given the separation distances involved from the site to any dwelling and given the existing use/condition of the service station area.
- 6.43 Kent Police have reviewed the application in regard to Crime Prevention Through Environmental Design (CPTED), and has advised a number of recommendations to design out crime. It is considered reasonable to impose an appropriate condition that seeks such details, in the interests of promoting safe and secure communities/environment, in accordance with policy LPRSP15 and the aims of the NPPF.
- 6.44 The Council's Environmental Protection Team have raised no objection to the proposal in terms of noise, air quality, land contamination and lighting. To further safeguard the visual amenity of the area, a condition is recommended to ensure the new external lighting is operated in accordance with the submitted lighting details. Whilst they also raise comments regarding drainage this has been resolved with KCC, the lead local flooding authority, as set out above.
- 6.45 UK Power Networks comment that the proposal is in the proximity of their substations and a suitable informative has been added to advise the applicant to discuss this matter directly with UK Power Networks.
- 6.46 The representations made by Hollingbourne Parish Council and all other interested parties have been considered in the assessment of this application. Please note here that any anti-social/criminal behaviour at the motorway services should be dealt with by the police; and any wider issues with the running of the site should be separately dealt with by the interested parties concerned. Due regard has been had to the Public Sector Equality Duty, as set out in Section 149 of the Equality Act 2010. It is considered that the application proposals would not undermine objectives of the Duty.

## 7.0 CONCLUSION

7.01 With everything considered the development would be acceptable with regard to the relevant provisions of the Development Plan, the NPPF and all other material considerations such as are relevant. On this basis a recommendation for approval, subject to a s106 legal agreement to secure a fee for long term monitoring for BNG and recommended conditions, is therefore made.

**8.0 RECOMMENDATION** - SUBJECT to no representations being received raising issues not already assessed, GRANT planning permission subject to the following conditions and the prior completion of a s106 legal agreement to secure the heads of terms set out below with delegated authority to the Head of Development Management to be able to settle or amend any necessary Heads of Terms, planning conditions and/or informatives in line with the matters set out in the recommendation and as resolved by the Planning Committee:

- To secure the on-site biodiversity habitat net gain of at least 10% for at least 30 years including monies (to be agreed by officers in consultation with KCC Ecology) to cover the costs of the local planning authority reviewing monitoring reports.

And the imposition of the conditions as set out below:

### **CONDITIONS**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following:

#### Approved plans

- RC620-2010; RC620-2002 Rev S (1:1250); RC620-2002 Rev S (1:1000); RC620-2003 Rev B;
- RC620-200F Rev A; RC620-2005 Rev B; RC620-2006; RC620-2007 Rev B; RC620-2008; and RC620 2012 Rev D (Proposed Phasing).
- 2401.03 Rev C; and 2401.04A.
- MM261023-2 x 2 plans (showing horizontal illuminance).
- GL2006-1 Rev 0.
- J7/04177; and J01047.
- 80644-02 100 Rev P01; 80644-02 100 Rev P02; 80644-02 101 Rev P01; 80644-02 101 Rev P02; and 80644-02 102 Rev P01.
- 9425 (sheet 2 of 7); 9425 (sheet 5 of 7); 9425 (sheet 6 of 7); 9425 (sheet 7 of 7); 9425 (sheet 3 of 8); 9425 (sheet 4 of 8); and 9425 (sheet 8 of 8).
- 223017/101 Rev C.

#### Approved documents

Planning Statement (by Astrum Planning); Landscape and Visual Impact Assessment (by Leeming Associates, dated: Feb 2024); Ecological Appraisal, including figures 4, 6 and 8 (by FPCR, dated: July 2024); Bat Survey Report (by FPCR, dated: June 2024); Flood Risk Assessment (by Geosmart Info Ltd, dated: 17/04/14); Phase 1 Environmental Risk Assessment (by Constructive Evaluation, dated: Aug 2015); Outdoor Lighting Report (by Gemma Lighting, dated: 11/07/24); Noise Impact Assessment (by RSK Acoustics, dated: 31/05/24); Arboricultural Impact Assessment (by Aspect Arboriculture, dated: July 2024); Arboricultural Method Statement (by Aspect Arboriculture, dated: Sept 2024); Archaeological Desk-Based Assessment (by ADAS, dated: Nov 2024); Transport Statement (by SLR, dated: 12/07/24); Construction Traffic Management Plan (by Colonial Construction); Letter from FPCR (dated: 27/08/24); Letters from Baxter Glaysher Consulting (dated: 25/09/24 and 30/09/24); e-mail from agent regarding hard boundary treatments (dated: 29/09/24); Lighting specification sheet (Hurricane 250W – LED flood light); Jacksons Fencing sheet (ref: JSW 29 Issue 03); 2 x Zaun fencing sheets (profile mesh boundary fencing system); and Hikvision sheet (bullet camera details).

Reason: To clarify which plans have been approved and in the interests of proper planning.

3. Prior to commencement of development the applicant, or their agents or successors in title, will secure the implementation of:
- (i) archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and
  - (ii) following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the local planning authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded and that due regard is had to the preservation in situ of important archaeological remains.

4. Prior to the commencement of the development hereby approved, including site clearance, a site wide Ecological Management Plan (EMP) shall be submitted to and approved in writing by the local planning authority. The EMP shall include:
- (i) Aims and objectives of the EMP;
  - (ii) Habitat plan of the management areas;
  - (iii) Overview of the management to be implemented;
  - (iv) Timetable of the management requirements capable of being a 5 year rolling plan;
  - (v) Details of any monitoring required; and
  - (vi) Details of who will carry out the works and how it will be funded.

The EMP development shall be carried out in full accordance with the approved EMP and shall be maintained as such thereafter.

Reason: To ensure new planting is established and managed appropriately in long term; existing woodland is actively managed appropriately; and all habitats within site are suitably managed.

5. Prior to the commencement of Phase 2 of the development hereby approved (as shown on submitted drawing reference: RC620 2012 Rev D 'Proposed Phasing'), a detailed sustainable surface water drainage scheme for the development site shall be submitted to and approved in writing by the local planning authority. The detailed drainage scheme shall be based upon the submitted FRA (dated April 2024); the Baxter Glaysher Consulting's letter (dated 25/09/24); and the submitted calculations (dated May 2024), and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site. The drainage scheme for Phase 2 of the development hereby approved shall also demonstrate (with reference to published guidance):
- (i) that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
  - (ii) appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme for Phase 2 of the development hereby approved shall be implemented in accordance with the approved details and shall be maintained as such thereafter.

Reason: To ensure Phase 2 of the development hereby approved is served by satisfactory arrangements for disposal of surface water and to ensure development does not exacerbate risk of on/off site flooding. These details and accompanying calculations are required prior to commencement of development as they form intrinsic part of proposal, the approval of which cannot be disaggregated from carrying out of rest of development.

6. Prior to the first use of the HGV parking area hereby approved, a Verification Report (VR) pertaining to the surface water drainage system and prepared by a suitably competent person, shall be submitted to and approved by the local planning authority. The VR shall demonstrate that the drainage system constructed is consistent with that which was approved. The VR shall also 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. The development here by approved shall then be operated and maintained in full accordance with the VR thereafter.

Reason: To ensure flood risks from development to future users of land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure development as constructed is compliant with and subsequently maintained pursuant to requirements of paragraph 175 of National Planning Policy Framework (2023).

7. Prior to the first use of the HGV parking area hereby approved an implemented and complete programme of archaeological post excavation and publication work, in accordance with a written specification and timetable, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure results of archaeological investigation are properly assessed and disseminated.

8. Prior to the first use of the HGV parking area hereby approved a programme of heritage interpretation, in accordance with a written specification and timetable, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure community and visitor awareness, understanding and enjoyment of heritage.

9. Prior to the first use of the HGV parking area hereby approved, the following ecological enhancements shall be submitted to and approved in writing by the local planning authority:
  - (i) Details of manufacturer specifications (not wooden), numbers and locations (including height) of bat boxes; and
  - (ii) Details of manufacturer specifications (not wooden), numbers and locations (including height) of bird boxes; and chosen bird boxes shall be for red/amber listed species only.

All of the approved enhancements shall then be erected/installed prior to the first use of the HGV parking area and shall be maintained as such thereafter.

Reason: In the interests of biodiversity enhancement.

10. Prior to the first use of the HGV parking area hereby approved, details of how the development has designed out crime (in reference to Secured by Design) shall be submitted to and approved in writing by the local planning authority. The approved details shall be in place prior to the first use of the of the HGV parking area hereby approved and shall be maintained as such thereafter.

Reason: In the interests of promoting safe and secure communities and environment.

11. Prior to the first use/operation of the external lighting hereby approved details of how this lighting has regard to the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night', including details of horizontal and vertical light spill, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure light spill has minimal impact on bats.

12. The development hereby approved shall be carried out in accordance with the submitted landscaping details (including drawing references 2401.03 Rev C and 2401.04A); and prior to the first use of the HGV parking area hereby approved, a site specific 10 year Landscape Management Plan shall be submitted to and approved in writing by the local planning authority. All landscaping specified in the approved details shall be carried out in the first planting season (1 October to end of February) following the first use of the HGV parking area hereby approved. The approved landscaping shall then be retained for at least 10 years following its implementation and shall be managed and retained strictly in accordance with the approved Landscape Management Plan, and any approved or retained seeding or turfing which fails to establish, or any trees or plants which, before a period of 10 years from the completion of the development has expired, die or become so seriously damaged or diseased that their amenity value has been adversely affected, shall be replaced in the next planting season with plants of the same species and size as detailed in the approved landscape scheme.

Reason: To safeguard the amenity of the countryside hereabouts that falls within the setting of the Kent Downs National Landscape; and in the interests of biodiversity enhancement.

13. The development hereby approved shall be carried out in accordance with the submitted Outdoor Lighting Report (by Gemma Lighting, dated 11/07/24) and the two horizontal illuminance (lux) drawings (project no. MM261023-2), and shall be maintained as such thereafter.

Reason: In the interests of amenity.

14. The development hereby approved shall be carried out in accordance with the precautionary mitigation approach for breeding birds, as set out in paragraph 7.27 of the submitted Ecological Appraisal (by FPCR, dated: July 2024).

Reason: To ensure breeding birds are not adversely impacted upon as a result of the development.

15. The development hereby approved shall be carried out in accordance with the submitted Arboricultural Method Statement (including tree protection details), (by Aspect Arboriculture, dated; Sept 2024) and drawing reference: 11808 TPP 02 Rev B. No equipment, plant, machinery or materials shall be brought onto the site prior to the erection of the approved barriers, and nothing shall be stored or placed, nor fires lit, within any of the protected areas; and these measures shall be maintained until all equipment, machinery and surplus materials have been removed from the site.

Reason: To safeguard the health and longevity of existing trees to be retained.

16. The development hereby approved shall be carried out in accordance with the hard boundary treatments, as shown in the submitted plans/details, with the metal mesh security fencing being only dark green in colour. The development hereby permitted shall be maintained as such thereafter.

Reason: To safeguard the character and appearance of the area.

17. The facing brickwork and roof tiles to be used in the construction of the external surfaces of the building extension hereby approved shall match those used in the existing building.

Reason: To ensure a satisfactory appearance to the development.

18. If the development hereby approved has not commenced within 2 years of the submitted bat emergence surveys (as detailed within the Bat Survey by FPCR, dated: June 2024), the development shall not commence until a review and if necessary an update of the report has been submitted to and approved in writing by the local planning authority. The development shall then be carried out in accordance with the approved mitigation/details and shall be maintained as such thereafter.

Reason: In the interest of protecting bats.



19. The development hereby approved shall not use piling or any other foundation designs using penetrative methods.

Reason: To ensure the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants.

### **INFORMATIVES**

1. The development is within the proximity of UK Power Networks substations and on this basis the applicant is advised to contact UK Power Networks directly on this matter: [Distribution Network Operator | UK Power Networks](#)
2. The applicant is advised to refer to the Environment Agency's groundwater position available from gov.uk.
3. The Environment Agency advises that developers should:
  - Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination.
  - Refer to their Guiding principles for land contamination for the type of information that they require in order to assess risks to controlled waters from site.
  - Consider using National Quality Mark Scheme for Land Contamination Management which involves use of competent persons to ensure that land contamination risks are appropriately managed Refer to the contaminated land pages on gov.uk for more information.
4. The discharge of domestic sewage may be subject to General Binding Rules (GBRs) under the Environmental Permitting (England & Wales) Regulations 2016, which provide a statutory baseline of good practice. More information can be found online: <https://www.gov.uk/permits-you-need-for-septic-tanks/permits> or contact the Environment Agency on 03708 506506.
5. The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2), provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:
  - excavated materials recovered via a treatment operation can be reused on-site providing they are treated to a standard such they are fit for purpose and unlikely to cause pollution.
  - treated materials can be transferred between sites as part of a hub and cluster project.
  - some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. We recommend that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.UK

6. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:
  - Duty of Care Regulations 1991
  - Hazardous Waste (England and Wales) Regulations 2005
  - Environmental Permitting (England and Wales) Regulations 2016
  - The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, we should be contacted for advice at an early stage to avoid any delays. If the

total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

7. Pursuant to condition 5 of this permission and the required sustainable surface water drainage scheme, the applicant is advised that in line with NPPF paragraph 175, KCC prefer the use of multifunctional soft SuDS over harder engineered solutions; and although it is acknowledged that the opportunity for these may be limited, where possible detailed design should seek to introduce soft measures as part of the overall SuDS proposals. The detailed design should apply the relevant climate change allowance to the 1 in 30 year return period event as well as the 1 in 100 year, and present simulation results as critical by max level. Details are available at: <https://environment.data.gov.uk/hydrology/climate-change-allowances/rainfall>

NB: For full details of all papers submitted with this application please refer to the relevant Public Access pages on the council's website.