

Cascades Leisure Centre, Thong Lane, Gravesend

Section 73 Application: Planning Statement

Gravesham Borough Council

02 March 2026

Lichfields is the pre-eminent planning and development consultancy in the UK

**We've been helping create great places
for over 60 years.**

lichfields.uk

Contents

1.0	Introduction	1
	Scope of Submission	1
	Structure of Statement	2
2.0	Site & Context	3
	The Site	3
	Site Access	3
	Planning Designations	3
	Surrounding Area	4
	The Extant Permission	4
	Relevant Planning History	5
3.0	Pre-Application Engagement	8
4.0	Proposed Scheme Amendments	10
	Internal and Building Footprint Amendments	10
	External Amendments	11
	Public Realm, Landscape & Amenity Space Amendments	13
	Drainage Strategy	13
	Energy & Sustainability	14
	Construction Management	14
	Proposed Amendments to Approved Conditions	15
5.0	Planning Policy	20
	National Planning Policy Framework	20
	Statutory Development Plan	21
	Planning Guidance	22
6.0	Planning Assessment	23
	Principle of Development	23
	Green Belt	23
	Amendments to Sport and Play Facilities	24

	Design	26
	Arboricultural Impact	27
	Landscape & Visual Impact	28
	Energy & Sustainability	29
	Transport	30
	Air Quality	32
	Flood Risk & Drainage	33
	Noise & Vibration	34
	Ventilation	35
7.0	Conclusion	36

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lichfields to accompany an application made under Section 73 of the Town and Country Planning Act (1990) for an amendment to planning permission ref. 20221293 for the redevelopment of Cascades Leisure Centre, Thong Lane, Gravesend, DA12 4LG ('the site'). The application is submitted on behalf of Gravesham Borough Council. The Local Planning Authority is Gravesham Borough Council ('Gravesham BC').
- 1.2 The proposed amendments sought under Section 73 are as follows:
- "Section 73 application of the Town and Country Planning Act (1990) for an amendment to planning permission ref. 20221293 to facilitate changes to the building height, footprint and elements of the facades, alongside elements of the approved hard and soft landscaping areas of the approved leisure centre scheme."*
- 1.3 This Section 73 application is principally to vary the wording of Condition 2 (Approved Plans), Condition 10 (Noise Assessment), Condition 19 (Soft Landscaping Scheme) part (iii), Condition 23 (Noise Assessment) and Condition 34 (Energy Efficiency), and to remove Condition 13 (Play Equipment) attached to planning permission ref. 20221293.
- 1.4 The proposed amendments have been developed through a process of positive pre-application consultation with Planning and Design Officers at Gravesham BC, as well as relevant third-party statutory consultees such as Sport England.
- 1.5 A number of updated technical documents have also been prepared to support this Section 73 application, as agreed through pre-application engagement with Gravesham BC (ref. PRE20250059).
- 1.6 A Section 96a application (Planning Portal ref. PP-14637974) has also been submitted alongside this Section 73 application to regularise the description of development of planning permission ref. 20221293 in line with the proposed development under this Section 73 application. This approach has been agreed with officers at Gravesham BC.

Scope of Submission

- 1.7 This Section 73 planning application comprises:
- 1 Planning Application Form and Ownership Certificates;
 - 2 Application Drawings (for approval), prepared by Space & Place;
 - 3 CIL Additional Information Form;
 - 4 Covering Letter, prepared by Lichfields;
 - 5 Planning Statement, prepared by Lichfields;
 - 6 Design and Access Statement Addendum, prepared by Space & Place;
 - 7 Landscape Statement Addendum, prepared by Colour;
 - 8 Landscape and Visual Impact Assessment Addendum, prepared by Colour;

- 9 Flood Risk Assessment and Drainage Strategy Addendum, prepared by Furness Partnership;
- 10 Transport Assessment Addendum, prepared by Stantec;
- 11 Framework Travel Plan Addendum, prepared by Stantec;
- 12 Construction Environmental Management Plan, prepared by Wilmott Dixon;
- 13 Noise Impact Assessment Addendum, prepared by Stantec;
- 14 Air Quality Assessment Addendum, prepared by Stantec;
- 15 External Lighting Strategy Addendum, prepared by Desco;
- 16 Ventilation Statement Addendum, prepared by Desco;
- 17 Energy Statement Addendum, prepared by Desco;
- 18 Operational Waste Management Strategy Addendum, prepared by Atkins Realis;
- 19 Arboricultural Impact Assessment Addendum, prepared by Lloyd Bore; and
- 20 Updated Tree Protection Plan, prepared by Lloyd Bore.

Structure of Statement

1.8 This Planning Statement is structured as follows:

- **Section 2.0** provides a description of the site, relevant planning history, and key planning policy designations;
- **Section 3.0** provides a summary of the pre-application engagement undertaken to date;
- **Section 4.0** provides a description of the proposed scheme amendments;
- **Section 5.0** summarises the relevant national and local planning policy and guidance;
- **Section 6.0** assesses the proposed scheme amendments in the context of relevant planning policy and other material considerations; and
- **Section 7.0** provides a summary of the assessment and outlines our conclusions.

2.0 Site & Context

The Site

- 2.1 The site is located just under 3 miles south-east of Gravesend town centre and is approximately 4.5 ha.
- 2.2 The site is currently in leisure use, consisting of a leisure centre (Class E(d)), with an ancillary swimming pool, constructed in the late 1960s and early 1970s, and later additions to the building in the 1980s. The site also comprises of a public house (Sui Generis) with a residential unit above (Class C3), known as 'Regans Bar and Café' (both vacant), a car park with 183 parking spaces, a children's play area, a kick about field, 2 disused tennis courts and other hardstanding areas.
- 2.3 The site is located 67m above sea level on a small flat plateau that previously served Gravesend Airport and latterly as RAF Gravesend.

Site Access

- 2.4 Existing vehicular access and egress to the site is provided from two locations on Thong Lane, together forming a one-way route through the site. Thong Lane connects to the A2 arterial road to the south and Gravesend to the north.
- 2.5 Gravesend railway station is approximately 5km from the Site (10 min journey by car), with direct Thameslink and Southeastern services to London St Pancras International and other London stations. Two main bus routes (481 and 491) currently pass through the site, connecting Riverview Park with Gravesend Town Centre and onwards to Northfleet, Swanscombe, Greenhithe, Stone, Bluewater Shopping Centre and Dartford Town Centre. The Intercity 735 bus service between Riverview Park and Gravesend is also available at the bus stop adjacent to the site on Thong Lane.
- 2.6 National Cycle Network Route 1 passes close to the south bank of the River Thames through Gravesend Town Centre north of the site, whilst Route 177 passes parallel with the A2 arterial road south of the site.

Planning Designations

- 2.7 The site sits on the Urban/Rural boundary and is located within the Metropolitan Green Belt.
- 2.8 The entire site is located within Flood Zone 1 (Low Probability) on the Environment Agency (EA) Flood Map for Planning.
- 2.9 The site is located within an Area of Archaeological Notification and is adjacent to, but not within, the Higham Arable Farmland Landscape Character Area. It is also within the SSSI Impact Risk Zone (IRZ) of the Shorne and Ashenbank Woods SSSI which is approximately 800m south of the site and the risk zone of the Thames Estuary and Marshes Ramsar site, located 1.7km to the north.

- 2.10 The site is not located within a Conservation Area, nor are there any listed or locally listed buildings on the site. The nearest listed buildings are the Grade II Listed Baynards Cottage and the Grade II Listed White Horse Cottage over 1km away.

Surrounding Area

- 2.11 The site borders the Gravesend Model Marine and Engineering Society Ride (a model railway) and the Gravesend Golf Centre and to the north; the Legend Sports (bar and football/tennis court hire) to the east; the Southern Valley Golf Club to the south; and Thong Lane to the west.
- 2.12 Beyond these sport and leisure uses immediately surrounding the site, the area comprises farmland and woodland to the north, east and south of the site, with the next neighbouring village, Shorne, approximately one mile to the southeast.
- 2.13 Further north of the site lies the village of Chalk, which adjoins the eastern edge of Gravesend. Immediately opposite the site (on the western side of Thong Lane) is the Riverview Park neighbourhood of greater Gravesend which largely comprises detached and semi-detached residential properties of up to two storeys in height. Approximately 200m north of the site are two residential properties (semi-detached) on the eastern side of Thong Lane.
- 2.14 The site is approximately 2.5km inland of the southern bank of the River Thames, c.35km from Central London (to the west); and is close to Tilbury on the northern bank of the River Thames in Essex.
- 2.15 The Lower Thames Crossing, a proposed road crossing of the Thames Estuary, is a designated Nationally Significant Infrastructure Project and subsequently a safe guarded area is designated to the east of the Site. A Development Consent Order for the proposals was granted in March 2025.

The Extant Permission

- 2.16 On 3 March 2023, full planning permission ref. 20221293 was granted by Gravesham BC for the following redevelopment of the site:
- “Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the site to provide a new leisure centre with community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts, an new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking.”*
- 2.17 The approved full planning permission ref. 20221293 (‘the extant permission’) is to demolish the existing premises and provide a new replacement leisure centre with enhanced facilities to better serve the needs of the local community
- 2.18 Since the existing development was designed, there have been significant changes in market conditions and construction costs. As a result, Gravesham Borough Council has reappraised its options while continuing to seek the delivery of a high-quality new leisure and community facility. Full details of the proposed scheme amendments are set out at Section

4.0 of this Planning Statement and in the accompanying Design and Access Statement, prepared by Space & Place.

2.19 The following conditions are attached to the extant permission and relevant to this Section 73 application:

- Condition 2 (Approved Plans) sets out the plans and documents that the approved development shall be carried out in accordance with;
- Condition 10 (Noise Assessment) and Condition 23 (Noise Assessment) relate to noise emissions from the ventilation system and services plant respectively;
- Condition 13 (Play Equipment) requires details of play equipment for installation;
- Condition 19 (Soft Landscaping Scheme) part (iii) requires information for the design and specification of the sedum roof; and
- Condition 34 (Energy Efficiency) secures development in accordance with the approved Energy and Low Carbon Technology Statement.

2.20 As part of the various amendments sought under this Section 73 application, it is proposed to vary the wording of Condition 2, Condition 10, Condition 19 part (iii), Condition 23 and Condition 34, and to remove Condition 13. This approach has been agreed in principle with Gravesham BC through pre-application engagement and is confirmed in the formal pre-application feedback issued 24 November 2025 (ref. PRE20250059). Further details are set out at Section 4.0 of this Planning Statement.

Relevant Planning History

2.21 In addition to the extant permission, the following relevant planning history is summarised below.

Table 2.1 Summary of Relevant Planning History

Application Ref.	Description of Development	Status / Decision
20251198	<i>Application for the approval of condition 5 (part a, b and c) attached to planning reference number 20221293 relating to a strategy to deal with the potential risks associated with any contamination of the site.</i>	Approved 22/01/2026
20251170	<i>Application for the approval of condition 4 (Foul Water Strategy) and condition 6 (Surface Water Strategy) attached to planning reference number 20221293.</i>	Approved 19/01/2026
20251157	<i>Application for the approval of condition 9 (Archaeology) attached to planning reference number 20221293.</i>	Pending determination
20251171	<i>Application for the approval of condition 7 attached to planning reference number 20221293 relating to arboricultural impact assessment and arboricultural method statement.</i>	Approved 07/01/2026
20251172	<i>Application for the approval of condition 3 attached to planning reference number 20221293 relating to a Construction Environmental Management Plan (CEMP).</i>	Approved 05/01/2026

Application Ref.	Description of Development	Status / Decision
20221293	<i>Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the site to provide a new leisure centre with community pool, leisure water, cafe, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking.</i>	Approved 03/03/2023
20221224	<i>Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the demolition of the existing leisure centre and public house to provide a new build leisure centre (of a similar size to the existing) with community pool, training pool, leisure water, cafe, soft play, clip n climb facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts.</i>	EIA not required 30/11/2022
20130687	<i>Application for the prior approval of the 15 metre high Elara column with antennas with shroud along with additional cabinets and ancillary development.</i>	Prior approval not required 09/09/2013
20090517	<i>Installation of six new windows, new window/door and new fire escape doors in south elevation and three new windows and external staircase on north elevation</i>	Approved 03/09/2009
20080887	<i>Construction of new steps, ramps and platforms to provide a level access and formation of new entrance and enclosed corridor.</i>	Application withdrawn 08/10/2008
20050237	<i>Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for erection of a 15 metre high mobile phone 'flagpole' incorporating three antenna and ancillary development.</i>	Prior approval not required 22/04/2005
20050233	<i>Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for the erection of a 15 metre high mobile phone 'flagpole', incorporating one antenna, radio equipment housing and ancillary development.</i>	Prior approval not required 22/04/2005
19990757	<i>Installation of a 15m high monopole supporting 3 no. sector antennae and 4 no. transmission dishes, erection of an equipment cabin, an electrical meter cabinet and relocation of palisade fence with access gates.</i>	Prior approval not required 06/12/1999
19960364	<i>Erection of 4 no. pole mounted floodlights, 12m high to illuminate the existing outdoor netball courts.</i>	Approved 26/07/1996
19890978	<i>Erection of 4 no. pole mounted floodlights 12m high to illuminate the existing tennis hard court area.</i>	Approved 02/01/1990
19860844	<i>Application under Regulation 4 of the Town and Country Planning General Regulations 1976 for construction of a leisure pool with ancillary accommodation formation of a</i>	Approved 15/12/1986

Application Ref.	Description of Development	Status / Decision
	<i>new vehicular access onto thong lane laying out of 174 car parking spaces 2 coach parking spaces and parking provision for motor cycles and disabled drivers.</i>	
19860829	<i>Change of use of the ground floor of detached two storey building from groundsman's store to bar with toilet accommodation, erection of single store side extension to form cafe, preparation room, store and yard; erection of a front entrance porch; repositioning of external staircase and laying out of a car parking for the existing first floor level self-contained flat.</i>	Approved 20/11/1986
19770918	<i>Erection of squash courts with training room.</i>	Approved 04/01/1978

Source: Gravesham BC Public Planning Register

3.0 Pre-Application Engagement

3.1 In March 2025, the principle of a revised scheme was presented at a meeting to Gravesham BC Officers. This comprised a high-level concept pre-application meeting, prior to detailed design being worked up. The proposed changes presented to Officers included:

- A reduction in footprint from the approved scheme, resulting in an overall reduction of 706 sqm;
- Removal of sauna and steam room;
- Removal of the clip and climb element from the scheme;
- Removal of squash courts;
- External changes (window treatment, glazing etc.); and
- Landscape scheme amendments.

3.2 Following the meeting, Gravesham BC Officers confirmed informally that the proposed amendments do not go to the heart of the extant permission and therefore could be dealt with via a Section 73 application and a simultaneous Section 96a application to vary the description of development.

3.3 Subsequently, a formal pre-application meeting was held with Gravesham BC Officers on 24 November 2025, following conclusion of detailed design work to support the amended scheme. The formal Gravesham BC written pre-application feedback was issued on 03 December 2025 (ref. PRE20250059). A summary of this pre-application feedback is set out below:

- The principle of development has already been deemed acceptable by the granting of the extant planning permission for the leisure centre. The proposed changes are acceptable in principle and are not considered material to the approved scheme.
- Sport England will be consulted on any forthcoming Section 73 application to make changes to the approved scheme.
- In design terms, the proposed changes are not considered significant and still keep within the essence of the original scheme.
- With respect to the landscape changes, Condition 13 relates to the play equipment that is no longer being proposed and therefore any forthcoming Section 73 application should include the removal of this condition. No objection is raised to the retention of the play equipment in place of new equipment.
- In terms of landscape impacts, no concerns are raised by the proposed changes noting the adjacent National Landscape and public rights of way. The changes are considered to accord with Core Strategy Policy CS12 and NPPF Section 15.
- There will be no detrimental impact to neighbouring amenity. The proposed alterations therefore accord with Core Strategy Policy CS19 and NPPF Paragraph 135.
- No objection is raised to the proposed changes to the energy strategy. Condition 34 specifically refers to the approved Energy and Low Carbon Technology Statement so the Applicant may wish to apply to vary this condition if no longer applicable.

- The proposed change to the description of development to omit the ‘clip and climb’, two squash courts and improvements to the playground is considered non-material to the planning permission and can be made under a separate Section 96a application.

3.4 The pre-application feedback also confirms that Gravesham BC has engaged with Sport England with respect to the principle of removing both squash courts through amending the extant permission and that they have no objection in principle to this change.

4.0 Proposed Scheme Amendments

4.1 The principle of redeveloping the Cascades Leisure Centre site is established through the extant permission, approved by Gravesham BC on 03 March 2023. Design development has progressed since approval of the original scheme in 2023 to ensure that a new high quality leisure centre and associated benefits remain viable and deliverable in the context of significant market changes and build costs.

4.2 This section provides a description of the proposed scheme amendments under this Section 73 application, which are proposed to safeguard deliverability of the scheme whilst also seeking rational improvements to the extant permission.

Internal and Building Footprint Amendments

4.3 It is proposed to reduce the leisure centre building footprint compared to the extant permission of 7,316 sq.m GIA to 6,037 sq.m GIA. This results in an overall reduction in footprint of 706 sq.m (GEA), shortening the eastern and southern extents of the building.

4.4 Table 4.1 below provides a breakdown of the proposed floorspace by floor level compared to the extant permission.

Table 4.1 Extant Permission and Proposed Section 73 Floorspace

	Extant Permission	Proposed Scheme
Ground Floor (sq.m GIA)	4,935	4,290
First Floor (sq.m GIA)	2,138	1,747
Roof (sq.m GIA)	244 (inc. enclosed plant)	0
Total Floorspace (sq.m GIA)	7,317	6,037

Source: Space & Place

4.5 Full details of the proposed amendments are set out within the accompanying Design and Access Statement, however from a planning perspective, the key changes to the building are as listed below.

Ground Floor

4.6 In summary, the proposed changes at ground floor relate to:

- Slight reduction in pool hall size but no reduction in overall offer of a learner pool and main pool of eight lanes;
- Removal of sauna and steam room;
- Removal of clip and climb from scheme (which is listed within the description of development);
- Larger play café space proposed in amended scheme;
- Reduction in community space from three separate spaces to now providing two smaller spaces (overall provision of 71.63 sq.m GIA);
- General reconfiguration of floorplan in terms of storage, office space, WCs to suit the new redesign; and

- Omission of internal plant area adjacent to the large community room and 2 smaller plant rooms adjacent to entrance and next to sports hall in approved scheme (due to M&E strategy).

First Floor

4.7 In summary, the proposed changes at first floor relate to:

- Removal of both squash courts (which are listed within the description of development);
- Reconfiguration of circulation, changing facilities and storage facilities;
- Relocation of spin studio to the existing area of the squash courts in the approved scheme, resulting in an increase in spin studio floorspace;
- Reconfiguration of fitness suite to increase provision;
- Removal of plant space of 189.37 sq.m GIA (plant and server room); and
- Void over soft play zone repositioned and reduced to suit new location of soft play.

Roof Level

4.8 In summary, the proposed changes at roof level relate to:

- Removal of plant rooms;
- Removal of sedum roof;
- Simplification to the roof falls and structure in conjunction with the general lowering of roof heights;
- New plant screen to house the external M&E AHU's and other servicing plant. The ducts will be routed across the roofs and dropped into the building; and
- Repositioning of PV panels to suit roof proposals.

External Amendments

Building Massing

4.9 In summary, the proposed changes to the building massing are:

- Reduction of building footprint of 706 sq.m GEA by shortening its eastern and southern extents;
- Omission of level 2 plant rooms and replaced with screened element concealing the main AHU's and other plant equipment; and
- Simplification and lowering of roofs. This results in a reduction in height by 2.7m where the roof plant enclosure was formally located, 0.88m at the Community Wing and 0.57m at the Pool Hall Wing.

North Elevation

4.10 In summary, the proposed changes to the north elevation are:

- Simplification and reduced façade design resulting from the - 706 sq.m GEA building footprint, whilst retaining similar appearance to existing;
- Openings have been simplified and reconfigured to suit the new internal layout;
- Elevation pitches have been reduced and simplified to suit massing and roof proposals albeit the language of the façade remains as the approved scheme;
- The swimming pool height has been simplified and reduced;
- Change in flume configuration; and
- New soft play feature windows to soft play zone.

East Elevation

4.11 In summary, the proposed changes to the east elevation are:

- Simplification of openings;
- Flume reconfigured; and
- Simplification and lowering of façade.

South Elevation

4.12 In summary, the proposed changes to the south elevation are:

- Simplification of swimming pool façade which is now vertical façade as opposed to inclined elevation - retaining the vertical concept of the other elevations. A feature reveal surrounds the pool glazing to maintain visual character despite the alteration of the raked façade;
- Reduction in height and width of the central core to suit the proposed layout with a reduction in the external terrace and simplification of façade and openings;
- Sports hall massing moved further into the building due to omission of spaces between the approved and new scheme; and
- Glazed openings to the pool hall optimised in height to align with efficient panel sizes.

West Elevation

4.13 In summary, the proposed changes to the west elevation are:

- Lowering of façade and alternative appearance to sports hall cladding;
- New soft play window feature and treatment; and
- Reconfiguration of openings and treatment to suit new internal layout.

Materiality

4.14 In summary, the proposed changes to the materiality of the leisure centre includes:

- Materials to the elevations have been reviewed and the proposals are to maintain the visual character whilst aligning to project viability. The pool hall is proposed with vertical profiled cladding with 'bronze-effect' finish consistent appearance with the extant permission;

- The soft play area facades and rear of the building are to have vertical profiled cladding with 'green-bronze effect' finish, consistent appearance with the extant permission;
- The sports hall facades are changed to grey metal cladding system instead of green;
- The previous standing seam roof to the swimming pool is replaced with a grey profiled membrane roof system to replicate the standing seam and maintain similar language to the approved scheme; and
- North elevation central core cladding has been simplified and proposed as a grey cladding system to provide a consistent appearance with the extant permission.

4.15 Full details of the proposed amendments are set out in the accompanying Design and Access Statement Addendum and application drawings for approval, prepared by Space & Place.

Public Realm, Landscape & Amenity Space Amendments

4.16 In addition to the changes to the approved building, the following changes are proposed to the landscaping scheme.

- Retention of the existing play area, equipment and landscaping in its current location.
- Relocation of the service road, associated staff parking, coach parking, substation and bin store further away from existing trees on the eastern and southern side of the building.
- Replacement of some of the previously proposed retaining walls with grassed earth embankments.
- Change of proposed hardscape materials on the service access road and around 'back of house' areas of the leisure centre building. Macadam roads and footways are proposed in these areas, in lieu of block and slab paving.
- The previously approved fitness loop is retained but amended to a grass-surfaced running route with delineating white lines removed.
- Removal of 8 no. Category C trees proposed due to the updated car parking layout and changes to the footprint of the building. Notwithstanding, 7 no. other trees previously noted for removal are to be retained (see Landscape Statement for more details). As such there will be a net loss of one tree.

Drainage Strategy

4.17 An updated Flood Risk Assessment & Drainage Strategy has been prepared by Furness Consulting Engineers to accompany this Section 73 application.

4.18 The approved drainage strategy discharged surface water from the site via infiltration soakaways located under the new car park. In consideration of the proposed build sequencing, with construction of the new building prior to demolition of the existing leisure centre, this proposal is no longer considered feasible. The approved design discharged surface water from the new leisure centre into a soakaway located beneath the proposed car park. The revised construction sequence now plans to build the new leisure centre first and only demolish the existing leisure centre afterwards. Since the proposed soakaway lies

beneath the area currently occupied by the existing building, this arrangement is no longer feasible.

- 4.19 The proposed alternative surface water drainage strategy is for two separate infiltration systems: one serving the proposed leisure centre building and another serving the new main car park to the north east. Surface water from the proposed leisure centre hardstanding and roof areas will be collected via a conventional below-ground drainage system and discharge to a new soakaway located within the soft landscape area to the south of the building. Surface water from the new car park will be managed through lined permeable paving, allowing infiltration into the ground.
- 4.20 With respect to foul water, a recent utility survey has identified the actual locations of the existing foul water manholes within the site, which has led to an updated, foul water drainage layout.
- 4.21 Full details of the revised surface water drainage strategy are set out in the accompanying Flood Risk Assessment & Drainage Strategy.

Energy & Sustainability

- 4.22 As per the approved scheme, all regulated energy use will be electrical. Space heating will be provided using air source heat pumps, providing a low energy, low carbon solution. The water to water heat pump is no longer proposed and instead the CO₂-based heat pumps shall be utilised to satisfy the building's domestic hot water requirements. The waste water heat recovery system has been omitted from the scheme in an effort to better balance the project cost and the buildings sustainability performance.
- 4.23 Full details are set out in the updated Energy and Low Carbon Technology Statement prepared by Desco to accompany this Section 73 application.

Construction Management

- 4.24 Key changes to the construction arrangements for the site include:
- All construction vehicles proposed as entering the site via a newly formed temporary bell mouth from Thong Lane to avoid conflict with pedestrians;
 - Welfare hub re-located from the existing tennis courts to the grassed area to the south of the existing car park, providing direct access to the construction site;
 - Material storage to be provided within the welfare compound to the south – locations for material storage had not previously been identified;
 - Inclusion of an area around the perimeter of the building to be left clear for mobile elevating working platforms unimpeded access;
 - Contractor parking to be provided within the welfare compound area to prevent contractors using the leisure centre parking; and
 - The welfare hub and site office will remain in situ on the grassed area to the south of the construction area until completion of the new leisure centre. Once this is complete, it will be relocated to the site of the proposed netball/tennis court to facilitate the

construction of the new car park. The grassed field will be reinstated to at least the same standard as it is currently once all works are complete.

Proposed Amendments to Approved Conditions

- 4.25 As a result of the proposed amendments, it is necessary to vary the wording of Condition 2 (Approved Plans), Condition 10 (Noise Assessment), Condition 19 (Soft Landscaping Scheme) part (iii), Condition 23 (Noise Assessment) and Condition 34 (Energy Efficiency), and to remove Condition 13 (Play Equipment) attached to planning permission ref. 20221293.

Condition 2 (Approved Plans)

- 4.26 Condition 2 states:

“The development hereby permitted shall be carried out in accordance with the following schedule of approved plans and documents:

- *Drawing no. 3929-ASP-B1-XX-DR-A-0801 (site location plan);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0802 (existing site plan);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0803-Po (proposed site plan);*
- *Drawing no. 3929-ASP-B1-00-DR-A-0810 (proposed ground floor plan);*
- *Drawing no. 3929-ASP-B1-01-DR-A-0811 (proposed first floor plan);*
- *Drawing no.3929-ASP-B1-02-DR-A-0812 (proposed second floor/roof plan);*
- *Drawing no. 3929-ASP-B1-02-DR-A-0813 (existing basement plan);*
- *Drawing no. 3929-ASP-B1-02-DR-A-0814 (existing ground floor plan);*
- *Drawing no. 3929-ASP-B1-02-DR-A-0815 (existing first floor plan);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0820 (proposed elevations north and east);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0821 (proposed elevations south and west);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0823 (existing elevations Regan’s bar);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0822 (existing elevations);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0830 (sections A and B);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0831 (sections C and D);*
- *Drawing no. 3929-ASP-B1-XX-DR-A-0840 (site sections 1, 2 and 3);*
- *Detailed Unexploded Ordnance (UXO) Threat & Risk Assessment (Feb 2023);*
- *Regans Café and Bar existing floor plans; and*
- *Drawing No. 2312-DES-ZZ-XX-DR-E-9301 Rev P01 – Electrical Services Existing External Lighting.*

Reason: For the avoidance of any doubt and in the interest of proper planning.”

- 4.27 It is proposed to update the list of approved plans. The proposed revised wording of Condition 2 (Approved Plans) is as follows (**amendments in red**):

“The development hereby permitted shall be carried out in accordance with the following schedule of approved plans and documents:

- Drawing no. *GCLC - ASP - B1 - XX - D - A - 0801- Po3 (Location Site Plan)*;
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0802- Po3 (Existing Site Plan)*;
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0803- Po3 (Site Plan)*;
- Drawing no. *GCLC- ASP- B1- 00- D- A- 0810- Po3 (GA Ground Floor Plan)*;
- Drawing no. *GCLC- ASP- B1- 01- D- A- 0811- Po3 (GA First Floor Plan)*;
- Drawing no. *GCLC- ASP- B1- 02- D- A- 0812- Po3 (GA Roof Floor Plan)*;
- Drawing no. 3929-ASP-B1-02-DR-A-0813 (existing basement plan);
- Drawing no. 3929-ASP-B1-02-DR-A-0814 (existing ground floor plan);
- Drawing no. 3929-ASP-B1-02-DR-A-0815 (existing first floor plan);
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0820- Po2 (Elevations – North & East)*;
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0821- Po2 (Elevations – South & West)*;
- Drawing no. 3929-ASP-B1-XX-DR-A-0823 (existing elevations Regan’s bar);
- Drawing no. 3929-ASP-B1-XX-DR-A-0822 (existing elevations);
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0830- Po1 (GA Sections - A & B)*;
- Drawing no. *GCLC- ASP- B1- XX- D- A- 0831- Po2 (GA Sections – C & D)*;
- Drawing no. 3929-ASP-B1-XX-DR-A-0840 (site sections 1, 2 and 3);
- Detailed Unexploded Ordnance (UXO) Threat & Risk Assessment (Feb 2023);
- Regans Café and Bar existing floor plans; and
- Drawing No. 2312-DES-ZZ-XX-DR-E-9301 Rev Po1 – Electrical Services Existing External Lighting.

Reason: For the avoidance of any doubt and in the interest of proper planning.”

Condition 10 (Noise Assessment)

4.28

Given that Condition 10 references a superseded version of the relevant British Standard and does not represent a best practice approach to noise sensitive properties, it is suggested that Condition 10 be amended as follows (**amendments in red**):

“Prior to the commencement of any above ground works, the applicant shall:

A. Submit a scheme in writing, including a noise survey, to the Local Planning Authority for approval in relation to noise control. The extraction system must be designed and installed in accordance with the “EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)”.

The noise survey should assess the worst-case scenario noise impact from the proposed extract and ventilation system, on nearby residential properties and must:

(i) Assess the whole system and any tonal elements associated it; a 1/3 octave band analysis may be necessary.

(ii) Assess structural transmission with the use of anti-vibration mounts where necessary, linings to ductwork to prevent noise transmission, any inline silencers and provide details of where they have been installed.

(iii) Use the results of the noise survey to ensure that the noise generated at **1m from the worst-affected window** any noise sensitive property meets the requirements laid down in BS4142:2014+A1:2019 "Method for Rating and Assessing Industrial and Commercial Sound".

B. Install and commission the extract system using a competent ventilation engineer in accordance with approved details. Provide a commissioning report to the Local Planning Authority to verify the installation, including post completion noise levels.

The equipment shall be maintained and operated in a condition such that the requirements of BS4142:2014+A1:2019 continue to be met.

Reason: To protect the amenities of the surrounding area in accordance with policy CS19 of the Gravesham Core Strategy 2014 and paragraph 185 of the National Planning Policy Framework 2021."

Condition 13 (Play Equipment)

4.29 Condition 13 states:

"Prior to the commencement of any hard and soft landscaping details of the play equipment (including timetable for installation) within the play area as identified as such on the approved plans shall be submitted to and approved, in writing, by the Local Planning Authority. The approved play equipment shall be installed in accordance with the approved timetable and maintained thereafter.

Reason: In order to ensure an acceptable standard of development upon completion, in accordance with policies CS10 and CS13 of the Gravesham Core Strategy 2014."

4.30 Due to the proposed retention of existing play equipment, it is proposed to **remove Condition 13 entirely** - as agreed with Gravesham BC through pre-application engagement.

Condition 19 (Soft Landscaping Scheme)

4.31 Condition 19 states:

"Prior to the first use of the development herein approved, full details of a soft landscape scheme addressing the following and including a timetable for implementation shall be submitted to and approved in writing by the Local Planning Authority:

i. Plans and information providing details of existing and proposed soft landscape works, including details of the trim trail, planting plans, tree positions, planting build ups, written specifications (including cultivation and other operations associated with grass, tree and planting establishment, aftercare, and maintenance); schedules of plants, noting species, plant sizes, root treatments and proposed numbers/densities where appropriate.

ii. *Details for the design and specification of tree planting to enable healthy establishment at maturity. Information should provide details for the planting environment (including within hard landscape and raised planters), calculated soil volume, tree support and tie specification, guards and grilles, aeration and irrigation systems, soil build-up information (avoiding the use of tree sand), tree cell systems (to street tree planting environments).*

iii. *Detailed information for the design and specification of the sedum roof, and details of irrigation systems.*

The development shall be implemented in accordance with the approved details and timetable and any trees or plants which within 5 years of planting are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies CS12 and CS19 of the Gravesham Core Strategy 2014.”

- 4.32 The proposed amendments at roof level include the removal of the sedum roof. It is therefore proposed to amend the wording of Condition 19 to **remove part (iii) only**, pursuant to the sedum roof.

Condition 23 (Noise Assessment)

- 4.33 Given that Condition 23 references a superseded version of the relevant British Standard and represents an outdated approach to limits relative to background sound levels, it is suggested that Condition 23 be amended as follows (**amendments in red**):

“Notwithstanding the submitted information, and prior to the bringing into use of the development herein approved, a noise impact assessment which looks at the impact of the plant related to the heating, building ventilation, pool water treatment, kitchen extraction and any other plant that will be installed, including the cumulative impact of the plant, to include recommendations that need to be implemented in order to comply with the following shall be submitted to and approved in writing by the Local Planning Authority:

- *The internal ambient noise levels in all habitable rooms of the nearest residential dwellings to the development shall not exceed the guideline LAeq values found in Table 4 of BS8233:2014.*
- *The maximum internal noise levels in all habitable rooms of the nearest residential dwellings should **not exceed** 45dB L_{Amax} more than 10 times per night in accordance with the Professional Practice Guidance on Planning & Noise and the WHO Guidelines for Community Noise.*
- *If relevant, the rating noise from fixed building services/mechanical plant/equipment associated with the development shall not exceed the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS 4142:2014**+A1:2019**.*

The assessment shall also cover the noise impact from the leisure activities of the site particularly from outside activities taking place such as loud music, sporting activities, PA systems, etc. and include recommendations for measures to prevent or mitigate the impact on the neighbouring residential properties from leisure activities that will take place in the new development, especially if taking place outside.

Within three months of the building being brought into use a verification report showing compliance with a shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development does not prejudice neighbouring amenity in accordance with Policy CS19 of the Gravesham Core Strategy 2014.”

Condition 34 (Energy Efficiency)

4.34 It is proposed to update Condition 34 to reference the updated Energy and Low Carbon Technology Statement, prepared by Desco, as follows (**amendments in red**):

*“The development herein approved shall incorporate the measures to address energy efficiency and climate change as set out within the submitted **Energy and Low Carbon Technology Statement (ref. 2312-50-RPT-01)**. The development shall not be brought into use until a verification report prepared by a suitably qualified professional has been submitted to and approved in writing by the Local Planning Authority confirming that all the approved measures have been implemented.*

Reason: In the interests of sustainability and to positively address concerns regarding climate change in accordance with paragraph 154 the National Planning Policy Framework 2021.”

5.0 **Planning Policy**

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

5.2 The section outlines national and local planning policy and guidance of relevance to the proposed amendments. An assessment of the proposed Section 73 amendments against relevant planning policy and guidance is provided at Section 6.0.

National Planning Policy Framework

5.3 The National Planning Policy Framework (the ‘NPPF’) was most recently updated on 12 December 2024 and sets out the Government’s planning policies for England and how these should be applied. The NPPF is a material consideration in the determination of planning applications.

5.4 The NPPF states at paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve sustainable development, paragraph 8 states that the planning system therefore has three overarching objectives:

- An economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.5 Paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means that where the policies which are most important for determining the application are out-of-date, granting planning permission unless:

- The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 5.6 Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.
- 5.7 Chapter 12 sets out the Government's priorities for 'Achieving well-designed places' and states that *"the creation of high quality, beautiful and 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"*.
- 5.8 On 16 December 2025, the Government published a draft National Planning Policy Framework (NPPF) for consultation until 10 March 2026. This consultation seeks views on an updated version of the National Planning Policy Framework (NPPF). The draft NPPF currently holds no weight in the determination of planning applications considering its draft status.

Statutory Development Plan

- 5.9 The Statutory Development Plan for the site comprises:
- 1 Gravesham Local Plan Core Strategy and Policies Map (2014); and
 - 2 Gravesham Local Plan First Review: Saved and Deleted Policies Version (September 2014).
- 5.10 Relevant Core Strategy policies to the extant permission include:
- CS01 – Sustainable Development
 - CS02 – Scale and Distribution of Development
 - CS07 – Economy, Employment and Skills
 - CS08 – Retail, Leisure and the Hierarchy of Centres
 - CS10 – Physical and Social Infrastructure
 - CS11 – Transport
 - CS12 – Green Infrastructure
 - CS13 – Green Space, Sport and Recreation
 - CS18 – Climate Change
 - CS19 – Design and Development Principle
 - CS20 – Heritage and the Historic Environment
- 5.11 Additionally, saved policies in the Gravesham Local Plan applicable to the site are set out below. It is noted that these policies are now significantly outdated.
- TC7: Other Archaeological Sites
 - T1: Impact of Development on the Highway Network
 - T4: Impact of Development on the Highway Network
 - T5: Access to the Identified Highway Network
 - P3: Policy for Vehicle Parking Standards

- 5.12 With respect to the emerging Local Plan, the Council carried out a Regulation 18 Consultation on the Partial Review of the Core Strategy between October 2020 – December 2020, including site allocations. The Council has not yet progressed to Regulation 19 stage. The Council's Local Development Scheme (March 2025) timetabled the Regulation 19 consultation for July – October 2025, which has not yet taken place. Given the preliminary stage of Local Plan review (Regulation 18), the emerging Local Plan has very limited weight in decision making and is not considered further in this Planning Statement.

Planning Guidance

- 5.13 Alongside the NPPF and statutory development plan, the following Supplementary Planning Documents (SPDs) are of relevance and comprise material considerations in planning decisions:
- Design for Gravesham: Design Code (2024);
 - SPG 4 - KCC Parking Standards (2006);
 - Gravesham Landscape Character Assessment (2009); and
 - The Kent Downs AONB Management Plan (2021-2026).

6.0 Planning Assessment

- 6.1 This section provides a proportionate assessment of the proposed minor material amendments against relevant planning policy and guidance, informed by pre-application discussions held with Gravesham BC and relevant third parties.

Principle of Development

- 6.2 The Statutory Development Plan for the site remains unchanged since the extant permission was approved by Gravesham BC on 3 March 2023. The NPPF was most recently updated in 2024, and continues to support the effective use of land, including making as much use as possible of previously developed land (NPPF paragraph 124). Overall, the core aims and objectives of national and local planning policy support for the development of previously developed land is materially consistent with the policy environment of the extant permission. On this basis, the principle of redeveloping Cascades Leisure Centre remains established by the extant permission. The proposed Class E(d) leisure centre land use remains unchanged.

Green Belt

- 6.3 NPPF paragraph 154 sets out a number of exemptions where development in the Green Belt is not inappropriate. Paragraph 154 (d) states:

“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces”

- 6.4 In granting the extant planning permission, the Council determined that the proposed development comprised appropriate development in the Green Belt in accordance with paragraph 154 (d). The Committee Report for the extant permission noted the proposed location of the proposed leisure centre closer to the residential settlement would leave the remainder of the site more open, and in turn, improve the openness within the Green Belt and reduce encroachment into the countryside. The proposed building was recognised as covering a smaller area of land, reducing on-site hardstanding and consolidating the existing buildings into a single form.

- 6.5 This Section 73 application proposes a net reduction of 1,279 sq.m GIA of Class E(d) floorspace compared to the extant permission (7,316 sq.m GIA). The proposed floorspace also comprises a reduction of 637 sq.m GIA compared to the existing 6,674 sq.m GIA leisure centre. With respect to the buildings external footprint, this results in a reduction of 706 sq.m GEA, shortening at the east and south building extents. The location of the building is unchanged, and the height of the proposed building has been reduced between 0.57 m - 2.7 m in parts. Therefore, previous conclusions held by the Council that the proposed building was not materially larger than the one it replaces remain unchanged, and in fact the proposal has reduced in both height and massing. Accordingly, the proposed amendments under this Section 73 application do not impact former conclusions that the proposed development comprises appropriate development in the Green Belt, in accordance with NPPF paragraph 154 (d).

- 6.6 On the basis that the NPPF paragraph 154 (d) exemption continues to apply, a detailed assessment against paragraph 154 exemption (g) with respect to ‘openness’ has not been

undertaken for this Section 73 application. Notwithstanding, for completeness the Landscape and Visual Impact section below demonstrates that the proposed amendments would not have a greater impact on the openness of the Green Belt than the existing development, in accordance with NPPF Paragraph 154 (g).

Amendments to Sport and Play Facilities

- 6.7 NPPF Paragraph 96 (c) states that planning decisions should aim to achieve healthy, inclusive and safe places which:
- “enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*
- 6.8 Policy CS10 of the Gravesham Core Strategy 2014 supports 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. Core Strategy Policy CS13 seeks to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities in the Borough.
- 6.9 The approved in-principle functions of the building are retained as part of this Section 73 application, including delivery of a regional competition level pool and associated facilities, as well as the design and layout ethos to the extant permission. However, due to increased construction costs, the extant permission is no longer viable or deliverable. Therefore, following a detailed design review process to safeguard deliverability of the scheme, minor amendments are proposed to the internal sport facilities.
- 6.10 Full details of the proposed changes and reconfiguration of the proposed facilities are set out in the accompanying Design and Access Statement, prepared by Space & Place. The key changes comprise the following:
- Retention of the existing play area;
 - Retention of previously proposed fitness loop with an amended grass-surface and removed white line delineation;
 - Removal of sauna and steam room (- 18.63 sq.m GIA);
 - Removal of clip and climb facility scheme (-112.27 sq.m GIA); and
 - Removal of 2 no. squash courts (-125.3 sq.m GIA).
- 6.11 The proposed omission of the new external play area and associated soft landscaping is achievable due to the revised location of the stormwater storage facility, previously proposed beneath the existing play area. Further details are provided in the Flood Risk & Drainage section below. The existing play equipment in this location is relatively new, having been recently upgraded by the GBC and therefore still of a high standard. Indeed, the Council’s pre-app response (ref. PRE20250059) raised no objection to the proposed omission of the new external play area in favour of preserving the existing play equipment in its current location. The proposed amendments to the fitness loop with an amended

grass-surface will importantly retain the in-principle provision of an outdoor running route as approved under the extant permission.

- 6.12 The proposed removal of squash courts and the clip and climb facility is included within the updated description of development proposed under the accompanying non-material amendment application.
- 6.13 Gravesham BC pre-application feedback (ref. PRE20250059) confirms that the Council has undertaken pre-application engagement with Sport England regarding the proposed removal of both squash courts from the extant permission via a Section 73 application. It is considered that this provision is surplus to requirements. It is acknowledged that further consultation with Sport England will be undertaken as part of the Section 73 application process. Further, pre-application feedback from Gravesham BC confirmed that the proposed changes, including the 1,279 sq.m GIA reduction in Class E(d) floorspace and revised sport facilities, are acceptable in principle and not considered material to the approved scheme.
- 6.14 The proposed leisure centre will retain a wide range of activity spaces which continues to offer a significant betterment for local residents, including:
- Eight lane 25m competition standard swimming pool with spectator provision;
 - A dedicated teaching pool;
 - Larger fitness suite;
 - Larger sports hall and ability to accommodate events;
 - Bigger, and more advanced, group exercise studios;
 - Children's indoor soft play area;
 - Community health and meeting spaces; and
 - Improved catering/café facilities.
- 6.15 On this basis, the proposed amendments are considered to retain the approved in-principle provision of wide-ranging and high-quality community and leisure facilities, namely the delivery of a regional competition standard pool and spectator area, as well as the increased size of the sports hall and fitness suite, and improvements to the quality and functionality of the outdoor spaces.
- 6.16 The Council's Indoor Sports Strategy (2016) identifies the need for improvements to the Borough's two main sports centres, including Cascades Leisure Centre. The Strategy recognises a need for significant improvements in the quality and quantity of fitness and club swimming provision up until 2028 and a small increase also in the amount of sports hall space. The Strategy identifies that the existing leisure pool at Cascades is very limited in its ability to satisfy existing and future demand, noting that *"due to its form it feels dated and tired for a 21st century physical activity opportunity"*.
- 6.17 Whilst it is recognised a minor loss of provision is proposed, this Section 73 application seeks to safeguard deliverability of the scheme as a whole, including the proposed substantial betterment of wide-ranging sports and community facility provision. Overall, the proposed provision is considered to continue to comply with the aims and objectives of

NPPF Paragraph 96 (c) and Core Strategy Policies CS10 and CS13, and safeguard delivery of a key objective of the Council's Indoor Sports Strategy.

Design

- 6.18 Policy at all levels requires high quality design. NPPF Paragraph 131 sets out that the creation of high-quality, beautiful and 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.
- 6.19 Policy CS19 of the Core Strategy requires new development to be visually attractive, fit for purpose and locally distinctive. Proposals must conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards.
- 6.20 The Design for Gravesham Design Code SPD (May 2024) sets out a number of design principles for development in the Borough. Design Principle 4.3 states that each new development must enhance and not detract from the existing or emerging character of the area where it is situated. Design Principle 5.17 states that developments must have a coordinated site wide strategy for primary materials and colours.
- 6.21 Each design element of the proposed scheme has been thoroughly reviewed and assessed to ensure the overall viability of the project, whilst retaining principle functions, character and appearance of the extant permission. A key objective of the re-design has been to reduce the overall facility footprint while ensuring that the operational and functional requirements of the leisure centre are still being met. The building height has also been reduced through lowering roof Community Wing and Pool Hall Wing heights and removing redundant second-floor enclosures that formerly contained plant equipment. These have been replaced with screened external plant zones. Together, this has resulted in a reduction in the overall height of the leisure centre building by 2.7m where the roof plant enclosure was formally located, 0.88m at the Community Wing and 0.57m at the Pool Hall Wing.
- 6.22 The overall architectural character of the elevations has been preserved. The pitched façade elements remain although they have been simplified to conceal the newly rationalised flat roof pitches. The proposed simplification of the swimming pool façade, which is now vertical façade as opposed to inclined elevation, retains the vertical façade concept of the other elevations and further aligns with the co-ordinated site wide façade strategy in accordance with Design Code SPD Design Principle 5.17. In summary, the proposed façade treatment seeks to retain the established design language with vertical cladding approved under the extant permission.
- 6.23 With respect to materiality, the hall is proposed to be clad with vertical profiled cladding with a bronze-effect finish to maintain the design intent of the extant permission. Soft play area facades and the rear of the building is proposed to be clad with vertical profiled cladding with a green-bronze effect finish, to again maintain consistency of appearance with the extant permission. The revised sports hall façade in grey metal cladding is considered to mitigate incoherence between differing green cladding systems previously approved.

- 6.24 Due to the simplification of the roof, structure and its design strategy, external rainwater downpipes have been introduced on the elevations. The proposed strategy is to match the colour of the external downpipe elements to the facade to minimise impact on the external appearance.
- 6.25 Further details of the proposed design amendments, enhancements and rationale are set out in the accompanying Design and Access Statement and application drawings for approval, prepared by Space and Place.
- 6.26 Overall, it is considered that the minor internal and external amends to the building's design are sympathetic to the approved scheme, retaining its high-quality design in accordance with NPPF Paragraph 131, Core Strategy Policy CS19 and the Design for Gravesham Design Code SPD.

Arboricultural Impact

- 6.27 The accompanying text to Core Strategy Policy CS12 (Green Infrastructure) states:
- “Landscape features such as trees and hedgerows within the urban area are also important as they help to raise the quality of the environment and the quality of people's lives, as well as providing stepping stones and habitats for wildlife. Therefore, it is important that such landscape features within the urban area are retained and enhanced.”*
- 6.28 An Arboricultural Impact Assessment has been produced by Lloyd Bore in relation to the proposals. Its purpose is to assess the arboricultural implications of the proposed construction works on trees, and to outline any special construction measures that might be necessary to retain trees of value.
- 6.29 The tree removal associated with the extant planning permission has been reviewed for the Section 73 application. Following a review of trees affected by the revised building footprint, car park, as well as the position of existing and proposed hardstanding relative to RPAs, eight Category C trees not previously identified for removal are now proposed to be removed. These relate to one tree within G6, all five trees within G9, T15 and T29, which are all affected by the reconfiguration of the car park and its associated access. To mitigate this loss, seven Category C trees previously shown as removed are now proposed to be retained. This includes three trees within G4, two trees within G6 and the two trees that comprise G7. There will be a net loss of one tree in comparison to the previously approved scheme.
- 6.30 The arboricultural impacts of the proposed development remain the same as those of the approved scheme. The majority of trees that conflict directly with the proposed scheme and therefore require removal are C category specimens with a low retention value and should not therefore constrain development. It is recognised that a number of B category trees will also require removal where they conflict with the footprint of the new leisure centre and around the new car park – as per the approved scheme. The impact of this loss when viewed from along Thong Lane will be minimal due to the screening provided by the trees on the boundary and other arboricultural features within the site that are to be retained.
- 6.31 It is also noted that the proposed tree planting specification has been reduced in size, though not in number for the proposed woodland mix located in the more peripheral

regions of the site. This includes the trees comprising the woodland mix proposed on the northern and western regions of the main car park, as well as a few pockets elsewhere around the site. Notwithstanding, tree planting proposed within the immediate curtilage of the proposed leisure centre building, including its main car park, remains as per the extant permission.

- 6.32 Overall, it is considered that there is no conflict with Core Strategy Policy CS12 and that the arboricultural impacts remain the same as those of the approved scheme.

Landscape & Visual Impact

- 6.33 A Landscape and Visual Impact Assessment (LVIA) Addendum has been prepared by Colour to accompany this Section 73 application.
- 6.34 NPPF Chapter 13 refers to Green Belt land. The fundamental aim of Chapter 13 and Green Belt policy - to prevent urban sprawl by keeping land permanently open – remains unchanged from the former NPPF (2023) which the extant permission was assessed against. Paragraph 013 of the PPG on Green Belt¹, last updated 27 February 2025, clarifies that ‘openness’ is capable of having both spatial and visual aspects.
- 6.35 The Statutory Development Plan remains unchanged, and Local Plan policy (inter alia), reflects the NPPF’s broad policy and guidance that developments which maintain or improve the openness, and fit within the built-rural context, are viewed favorably. Core Strategy Policy CS12 (Green Infrastructure) states that the overall landscape character and valued landscapes will be conserved, restored and enhanced.
- 6.36 The LVIA identifies that save for the Development Consent Order for the National Highways Lower Thames Crossing road infrastructure c.200m east of the site, there are no other material changes to the baseline conditions of the LVIA study area.
- 6.37 The proposed design results in a reduction in the overall GEA of the proposed leisure centre building’s footprint by 706 sq.m by shortening its eastern and southern extents, and a reduction in height between 0.57 m - 2.7 m. Principally, the proposed design changes are considered to not materially change the findings of the approved LVIA with regards to planning policy relating to Green Belt, landscape, heritage, access, or Landscape Character Areas. This is because the proposed reduction in the height and massing of the leisure centre building generates less ‘harm’ the approved extant scheme. Further, no material changes are anticipated to with respect to the Zone of Visual Influence (ZVI) or the visual amenity of representative visual receptors, as assessed in the approved LVIA for the extant permission.
- 6.38 The proposed temporary car park in the north west corner of the site does not impact on landscape character or any landscape designations, as the proposed car park simply repurposes and resurfaces an existing expanse of hard standing. The omission of proposed trees to the existing play area and southern kickabout area is not considered to significantly impact landscape character as these areas are already surrounded by large, mature trees that provide a natural character to the site, while also contributing to the character of the surrounding area. Equally, no material changes are envisaged to the screening of the

¹ Paragraph: 013 Reference ID: 64-013-20250225

proposed building from representative viewpoints, as vegetative screening is still provided by existing mature trees which are to be retained.

- 6.39 This proposed reduction to the extent of the retaining wall and introduction of earth embankments will preserve more of the existing landscape character than was achieved under the extant permission.

External Lighting

- 6.40 With respect to external lighting, an updated External Lighting Strategy Report has been prepared by Desco to accompany this Section 73 application. Policy CS19 of the Core Strategy requires that new development avoids adverse environmental impacts arising from light pollution. Principally, the external lighting strategy principles are unchanged. The updated External Lighting Strategy Report has simply been prepared to regularise the report with the updated Site Plan. On this basis, the conclusions remain unchanged that the proposed lighting strategy is efficient in use, sensitive to planning considerations and does not impact adversely on-site ecology. Subject to approval of this Section 73 application, it is anticipated that a suitably worded condition will be attached to the permission to demonstrate compliance with Institute of Lighting Professionals Guidance, consistent with the extant permission.
- 6.41 Overall, the design changes embodied in the Section 73 scheme do not materially alter the conclusions of the planning-approved LVIA in relation to either landscape or visual impacts.

Energy & Sustainability

- 6.42 Core Strategy Policy CS18 (Climate Change) supports proposals that lead to a reduction in carbon footprint. Policy CS18 states that non-residential development proposals of 1,000 sq.m and above will be required to meet the BREEAM 'Excellent' standards of water efficiency and include provision for the collection of rainwater.
- 6.43 An updated Energy and Low Carbon Technology Statement has been prepared by Desco to accompany this Section 73 application. The building's sustainability strategy has been revised to strike a more pragmatic balance between environmental performance and financial viability. While certain high-cost sustainability features have been moderated, the design still adheres to core principles of energy efficiency and environmental responsibility which still considerably exceeds the latest Building Regulations minimum requirements. This approach attempts to ensure the building remains accessible and deliverable within budget for Gravesham Borough Council, without compromising its long-term operational performance or user comfort.
- 6.44 With respect to BREEAM water efficiency, the Energy and Low Carbon Technology Statement sets out the proposed water efficiency measures to meet BREEAM 'Excellent' standards, in accordance with Core Strategy Policy CS18.
- 6.45 The Energy and Low Carbon Technology Statement demonstrates that the proposed scheme will conform to building regulation notional limits, comprising an improvement over building regulation minimums. When measured for Building Regulations Part L compliance, the proposed scheme will deliver carbon emissions 10% lower than a modern Building Regulations compliant building and will only produce 21% of the existing leisure

centre's carbon emissions. Primary energy use of the proposed development will also be 10% lower than a Building Regulations compliant building.

6.46 The proposed development will have an estimated EPC rating of A, the same as the approved scheme, compared to a B (almost C) rating of the existing building.

6.47 Overall, the proposed building will be much more sustainable and energy efficient than the existing leisure centre building and has been designed in accordance with the energy performance and building efficiency objectives of Core Strategy Policy CS18.

Transport

6.48 Core Strategy Policy CS11 (Transport) states that new development should mitigate impacts on highways and public transport networks. Transport assessments and travel plans are required where appropriate, produced in accordance with national and local policy guidance. Parking in new development is required in accordance with adopted parking standards.

6.49 In accordance with Policy CS11, an updated Transport Assessment (TA) Addendum and Framework Travel Plan (TP) Addendum have been prepared by Stantec to accompany this Section 73 application. The submitted TA Addendum assesses the impacts of the proposed minor amendments on the capacity of the transport network.

6.50 Table 1 sets out the floorspace and parking provision for the approved scheme and proposed Section 73 application. These comprise the key elements against which the approved 2022 TA and the TA Addendum have been prepared respectively.

Table 1 Proposed floorspace and parking provision compared to extant permission ref. 20221293

	Extant Permission	Proposed S73
Floorspace (GIA)	7,316 sq.m	6,037 sq.m
Vehicle Parking	232 spaces	232 spaces (<i>unchanged</i>)
Cycle Parking	35 spaces	35 spaces (<i>unchanged</i>)
Motorcycle Parking	13 spaces	13 spaces (<i>unchanged</i>)

6.51 The existing 25 space car park at the site entry is also proposed to remain as existing. Therefore, in transport impact terms, the TA Addendum provides an assessment of proposed scheme considering the reduced floorspace of 1,279 sq.m (GIA) compared to the extant permission (17.5% reduction).

Trip Generation

6.52 The TA Addendum adopts the same methodology as the 2022 TA with respect to trip generation. The 2022 TA summarises the growth factor from 2022 to the 2028 forecast baseline year. The Section 73 TA Addendum growth factor has been extended to derive a factor for 2031 by extrapolating the Temprow growth factor adopted in the 2022 TA.

6.53 Principally, the proposed Section 73 application (6,037 sq.m GIA) results in fewer traffic movements than the existing leisure centre (6,674 sq.m GIA) and the approved leisure centre (7,316 sq.m GIA). Reduced AM and PM trip generation scenarios are set out at Section 5.0 of the accompanying TA Addendum to demonstrate the lower volume of

anticipated traffic at key junctions in the vicinity of the site. As the proposed leisure centre results in lower trip generation than both the existing leisure centre and the extant permission, updated junction modelling has not been undertaken by Stantec.

Vehicle Parking

- 6.54 The proposed vehicle parking provision is unchanged. It is acknowledged that updated Kent County Council (KCC) parking standards have been published since approval of the extant permission in March 2023, comprising the January 2025 KCC parking standards. The TA Addendum confirms that the January 2025 parking standards remain unchanged for Class E(d) facilities from the standards previously assessed in the 2022 TA. Therefore, no further assessment against KCC parking standards is required.
- 6.55 The parking accumulation exercise has been updated to reflect the reduced floor area proposed under this Section 73 application, demonstrating a lower parking accumulation demand compared to the extant permission. On this basis, the proposed unchanged parking provision continues to be sufficient to meet expected parking demand.
- 6.56 No change is proposed to the provision of 23 no. electric vehicle charging spaces. In compliance with Building Regulations Part S a further 10% of spaces shall be with the ducting for future electrical vehicle chargers

Cycle Parking

- 6.57 No change is proposed to cycle parking provision under this Section 73 application, and therefore the proposed provision remains in accordance with KCC's unchanged non-residential cycle parking standards.

Waste Storage & Servicing

- 6.58 There will be on site delivery and refuse collection movements associated with the proposed development as for the existing uses on site. The layout of the proposed Section 73 masterplan is generally consistent with that of the extant permission.
- 6.59 With respect to refuse vehicles entering and exiting the site, an updated swept path analysis has been completed and is included at Appendix A of the accompanying TA Addendum prepared by Stantec.
- 6.60 An Operational Waste Management Strategy Addendum, prepared by Atkins Realis accompanies the submission. The strategy sets out the estimated waste volumes for the development and the requirements for bins needed to store the waste. Using guidance from British Standard 5906:2005, the scheme is estimated to generate 18,617 litres of waste per week.
- 6.61 Calculations show that with a twice weekly collection of all waste streams, the scheme will require 9 x 1,100 litre Eurobins for residual waste and recycling and 2 x 240 litre wheelie bins for food waste. A bin store area to the south of the leisure centre is proposed to accommodate these bins, within which each waste stream can be deposited without the need to move bins for access.

Travel Plan

- 6.62 A Framework Travel Plan Addendum, prepared by Stantec, also accompanies this application. This document aims to reduce the number of car trips to and from the proposed development by promoting a range of sustainable alternatives, encouraging the use of these modes. The Framework Travel Plan Addendum concludes that the findings of the Framework Travel Plan for the extant permission do not change as a result of this Section 73 application.
- 6.63 Overall, the Transport Assessment Addendum and Framework Travel Plan Addendum detail how the proposed Section 73 amendments do not change the findings of the approved reports, which conclude that the development appropriately mitigates impacts on the highways network in line with Policy CS11 and Policy T1. On this basis, it is considered that the local policy requirements, relating to transport, continue to be met.

Construction Management

- 6.64 A Construction and Environmental Management Plan (CEMP), prepared by Tilbury Douglas, was approved under the extant permission. Willmott Dixon has reviewed the approved CEMP and determined that it does not satisfy standards required for the safety and wellbeing of pedestrians and fails to consider vehicular movements during construction and material storage. Subsequently, a revised CEMP has been prepared by Willmott Dixon and accompanies this Section 73 application. This provides further detail on the key issues within the approved CEMP and how they propose to rectify these in the updated document. A summary of the proposed amendment to the site's construction arrangements is set out at Section 4.0 of this Planning Statement.
- 6.65 Overall, it is considered that the revised construction arrangement is a significant improvement on the previously approved arrangement, with greater regard to both pedestrian and highway safety. The revised arrangements seek to safeguard the free flow of traffic on the highway and minimise the impact on local residents and businesses, in accordance with Core Strategy Policies CS11, CS12 and CS19.

Air Quality

- 6.66 NPPF paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by:
- “(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.”*
- 6.67 Core Strategy Policy CS19 requires that new development will be located, designed and constructed to avoid adverse environmental impacts, including air pollution. The Council has declared three Air Quality Management Areas (AQMAs) due to exceedances of the annual mean nitrogen dioxide (NO₂) national air quality objective (NAQO). However, the site is not located within an AQMA and pollutant concentrations recorded at nearby monitoring locations have been in compliance with the relevant NAQO in recent years.

- 6.68 An updated Air Quality Assessment (AQA) has been prepared by Stantec UK Limited to accompany this Section 73 application.
- 6.69 The Section 73 scheme is predicted to generate fewer vehicle trips than the existing leisure centre due to a reduction in floor area between the existing leisure centre (6,674 sq.m GIA) and the Proposed Development (6,037 sq.m GIA). Therefore, an emissions mitigation assessment in accordance with the Kent and Medway Air Quality Planning Guidance (2015) is not required as emissions to air resulting from the Proposed Development are expected to be less than the existing leisure centre. An emissions mitigation assessment is therefore not included within the accompanying updated AQA.
- 6.70 The construction activities have the potential to create dust. It is recommended that a package of mitigation measures in accordance with the Institute of Air Quality Management (IAQM) guidance is put in place to minimise the risk of elevated PM10 concentrations and dust soiling in the surrounding area. With mitigation in place the construction impacts are judged as being 'not significant'.
- 6.71 The predicted change in road traffic associated with the Proposed Development is below the Environmental Protection UK and IAQM guidance screening criteria. As such, the air quality impacts of the Proposed Development with regards to road traffic are considered to be 'not significant' and additional mitigation is not required. Nonetheless, further mitigation measures to reduce vehicle trips, and therefore associated pollutant emissions, will be implemented through the Framework Travel Plan Addendum.
- 6.72 Overall, the accompanying updated AQA concludes that the Section 73 scheme is in accordance with the requirements of the NPPF and relevant local and national guidance regarding air quality.

Flood Risk & Drainage

- 6.73 The proposed development is classified as 'Less Vulnerable' according to the NPPF. The site is located within Flood Zone 1, i.e. a low probability of sea and river flooding, and has a low risk of flooding from all other flood sources including fluvial, tidal, surface water, groundwater and artificial sources.
- 6.74 Core Strategy Policy CS18 requires that all proposals for development on sites at risk of flooding must be accompanied by a Flood Risk Assessment. With regard to drainage, the Council will seek to minimise the impact from new development on waste-water systems, requiring that surface water run-off must have no greater adverse impact than the existing use, and that SuDS are used on all developments where technically and financially feasible.
- 6.75 An updated Flood Risk Assessment & Drainage Strategy has been prepared by Furness Consulting Engineers to accompany this Section 73 application. With respect to surface water drainage, the proposed updated drainage strategy comprising two separate infiltration systems is considered to slightly improve the flood risk of the site, through the use of the permeable pavement and soakaway. This strategy will ensure stormwater is slowly discharged into the ground, mimicking natural processes. In accordance with Policy CS18, the use of permeable paving and a soakaway will ensure that the proposed development will result in a slight improvement to the flood risk of the site.

- 6.76 With respect to foul water, new foul drainage is proposed for the leisure centre building, which includes a pool water backwash tank, which will be discharged at 10L/s rate in accordance with the existing trade effluent agreement, subject to approval from Southern Water. The final point of connection from the site needs to be determined during later design stages.
- 6.77 Whereas the original foul water proposal included a connection directly to the public sewer in Thong Lane via a new manhole at the southwest corner of the site, the updated design proposes an indirect connection from the leisure centre to an existing foul chamber located between the leisure centre and the car park. Subsequently, there is an onward flow to the existing public sewer. All new connections and alterations will be subject to agreement with Southern Water.
- 6.78 Foul water from the existing leisure centre will remain operational until the new facility is completed, after which the existing building including its drainage will be demolished. Any temporary increase in foul water discharge during this period will be subject to agreement with Southern Water.

Noise & Vibration

- 6.79 Policy CS19 of the Core Strategy requires that new development avoids generating adverse environmental impacts, including noise.
- 6.80 An updated Noise Impact Assessment Addendum has been prepared by Stantec to accompany this Section 73 application. This document provides an updated assessment for the traffic noise and plant noise emission limits considering the proposed Section 73 amendments.
- 6.81 Updates to the NPPF since the extant permission with respect to noise were limited to paragraph numbers only and the content remains as per the previous version. Therefore, there is no change to planning policy against which the conclusions of the extant permission were determined.
- 6.82 The revised scheme has a smaller overall footprint than both the approved and existing leisure centre and, therefore, the expected traffic generation will be lower with a commensurate reduction in peak hour traffic volumes. The extant permission Noise Impact Assessment assessed traffic volumes for a larger scheme and concluded that this would have a negligible impact on surrounding noise sensitive receptors. On this basis, the proposed Section 73 scheme is considered to result in negligible noise impact, and is anticipated to generate a lower level of traffic generation than both the existing leisure centre and approved development.
- 6.83 The proposed scheme sees the relocation of some equipment from internal plantrooms to a new plant compound on the roof. The roof compound is proposed to house several air source heat pumps and other items of ventilation and heat rejection equipment, which will be enclosed with a suitably rated acoustic screen. With respect to plant noise emission limits, the approved scheme sought to control noise from new plant to no more than existing background sound levels at surrounding noise sensitive receptors. Against BS 4142:2014+A1:2019, the accompanying Noise Impact Assessment concludes that designing to this level indicates that new sound sources would have a low impact, assuming no acoustic characteristics or tonality. The same limits are therefore proposed. Updated

wording for Condition 10 and Condition 23 seeks to ensure the condition wording is up to date with respect to limits to relative background sound levels.

- 6.84 The limits set out in the accompanying Noise Impact Assessment Addendum are proposed to be met with all plant operating simultaneously. On this basis and provided the plant specification accords with the noise criteria in line with BS 4142:2014+A1:2019 guidance, the proposed Section 73 amendments will ensure the avoidance of adverse impacts relating to noise. On this basis, the proposed amendments are considered to continue to comply with Core Strategy Policy CS19.

Ventilation

- 6.85 Policy CS19 of Gravesham Core Strategy 2024 requires that new development will be located, designed and constructed to avoid adverse environmental impacts, including noise, air pollution and odour.
- 6.86 An updated Ventilation Statement has been prepared by Desco to accompany this Section 73 application. The approved Ventilation Statement under the extant permission included an allowance for a commercial-style kitchen, with heavy duty equipment for deep frying. The only change proposed via this Section 73 application is to amend this commercial-style kitchen to a domestic-style kitchen, resulting in a reduction to the proposed ventilation provision in comparison to the extant planning permission. The accompanying Ventilation Statement includes a revised kitchen ventilation strategy that will increase the thermal efficiency by allowing for heat recovery.
- 6.87 Considering the minor change to the proposed ventilation strategy, no additional odour, fume and noise impacts are anticipated in comparison to the extant permission. Therefore, the proposed development is considered to remain in accordance with Core Strategy Policy CS19.
- 6.88 Consistent with the extant permission, it is considered that the requirement to submit a supplementary ventilation assessment prior to works commencing on site will be secured by condition, including details of the proposed ventilation plant and recommendations to minimise odour, fume and noise impacts.

7.0 Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Gravesham BC and provides an assessment of the proposed Section 73 amendments to planning permission ref. 20221293 for the redevelopment of Cascades Leisure Centre, Thong Lane, Gravesend, DA12 4LG.
- 7.2 The proposed amendments sought under Section 73 are as follows:
- ““Section 73 application of the Town and Country Planning Act (1990) for an amendment to planning permission ref. 20221293 to facilitate changes to the building height, footprint and elements of the facades, alongside elements of the approved hard and soft landscaping areas of the approved leisure centre scheme.”*
- 7.3 This Section 73 application is principally to vary the wording of Condition 2 (Approved Plans), Condition 10 (Noise Assessment), Condition 19 (Soft Landscaping Scheme) part (iii), Condition 23 (Noise Assessment) and Condition 34 (Energy Efficiency), and to remove Condition 13 (Play Equipment) attached to planning permission ref. 20221293.
- 7.4 As set out in the Gravesham BC Pre-Application Feedback (ref. PRE20250059), the proposed amendments sought under this Section 73 application are minor in nature and scope and therefore are considered wholly acceptable in planning terms.
- 7.5 The proposed amendments have been developed through a process of positive pre-application consultation with Planning and Design Officers at Gravesham BC, as well as relevant third-party statutory consultees such as Sport England.
- 7.6 The proposed amendments retain the commitment to delivering a high-quality building and landscape design, as approved under the extant permission. Principally, the amendments are required to safeguard the approved sustainable redevelopment of Cascades Leisure Centre - securing long-term community use of the site through a high-quality new public leisure facility.
- 7.7 Overall, the proposed amendments comply with the objectives and requirements of the Development Plan and are considered to remain acceptable with regards to all other material planning considerations.

Birmingham
0121 713 1530
birmingham@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk