

SUMMARY REPORT

Application Ref:	20221293
Site Address:	Cascades Leisure Centre, Thong Lane, Gravesend
Application Description:	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.
Applicant:	Gravesham Borough Council
Agent:	Lichfields
Ward:	Riverview
Parish:	Non-Parish Area
Decision due date:	3 March 2023
Decision Level:	Planning Committee – Wednesday 1 March 2023
Reason for referral:	An application made on behalf of Gravesham Borough Council
Recommendation:	Delegated to Service Manager (Planning) to grant Permission subject to the applicant agreeing pre-commencement conditions and finalisation of planning conditions.

Summary of Reasons for Recommendations

The proposal is for the demolition and rebuild of Cascades Leisure Centre. It will involve the demolition of the main building and Regan's Bar and its replacement with a new leisure centre, outdoor play area, netball courts, trim trail and kick about area.

The principle of development is acceptable and the replacement building will have no detrimental impact on the openness of the Green Belt.

The proposals will have no detrimental impact on the surrounding landscape, character of the area, amenity, highway safety or parking. The scheme takes into account the history of the site and incorporates this in its design and play area.

All representations received from both 3rd parties and consultees and have been taken into account when considering this proposal and the development is considered to comply with local and national planning policy.

The recommendation is for the application to be APPROVED Planning Permission, subject to planning conditions as set out within the report

MAIN REPORT

1. Site Description and Surroundings

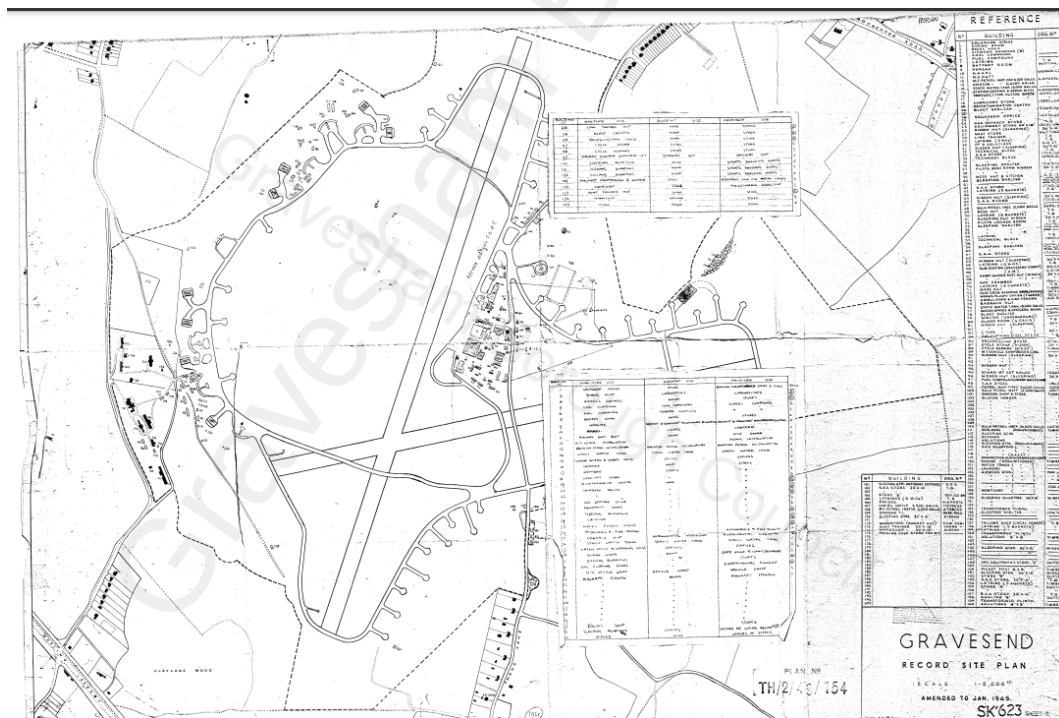
The application site is currently a leisure centre with a detached public house, car parking and play area. There are also disused netball courts and an informal football pitch to the southwest. The red line boundary for this proposal does not cover the whole site.

The application site lies within the Metropolitan Green Belt, beyond the urban area boundary as shown on the Gravesham Local Plan Core Strategy Policies Map (2014). The Riverview Park Estate lies to the west and open countryside to the east and south. Vehicular access to the site is via Thong Lane. The Thong Lane Conservation Area lies around 650 metres to the south, which includes within its area Whitehorse Cottage, which is Grade II Listed. Part of the Conservation Area also includes an area developed as post WWI smallholdings (Homes for Heroes) by the London County Council in around 1920.

To the south of the application site and east of Thong, the woodland on higher ground comprises part of the Kent Downs AONB. Much of this is designated as an SSSI due to its nature conservation interest. There are views of the application site from the edge of the AONB on higher ground along the Shorne-Ifield Road.

Aside from the area occupied by the Southern Valley Golf Course (which ceased operating in August 2022), the rural area surrounding the site is largely in arable use. Although historically it would have been arable land, forming part of a tenanted farm under the Darnley estate, it became incorporated into the London East/Gravesend Airport in 1932. Following a short period when it was used for training purposes, it was taken over and extended as an RAF base during WWII. With the cessation of that use in the 1950s, the land subsequently became used for recreational purposes and the construction of the Cascades Leisure Centre.

A withdrawn application (TH/2/49/154) plan showing the layout of the airfield in 1949 when Essex Aero proposed to acquire the site for a range of industrial uses can be seen below:



The below photos show the development of the site from 1940 until 1982:



Diagram: Source: Promap/Landmark Information Group
Published date: 1961

Diagram: Source: Promap/Landmark Information Group
Published date: 1982

Should Development Consent be granted for the Lower Thames Crossing, the site would be severed from the wider countryside to the east and south by a deep cutting forming part of the route of the Lower Thames Crossing. Other than being in proximity to the proposed route of the road, the actual application site is not affected by any 'safeguarding' direction.

The site is 4.5 ha in size and is currently in leisure use, consisting of a leisure centre (Class E(d)), with ancillary swimming pool, constructed in the late 1960s and early 1970s, with later additions to the building in the late 1980s. The Site also comprises of a public house (Sui Generis) with a residential unit above (Class C3), known as 'Regans Bar and Café', a car park with 183 parking spaces, a children's play area, a kick about field, 2 disused tennis courts, and other hardstanding areas.

The centre currently comprises a leisure pool with two water flumes and aqua play area with a casual viewing area. Of the dry side facilities, it provides a café, creche, 3No. court sports hall with climbing wall, 100No.+ station gym on two levels, 15No. station studio and 6No. squash courts (of which 3No. are used for fitness & storage). The facility also has a health suite comprising steam, sauna and treatment rooms together with attendant staff and administration offices.

Existing vehicular access and egress to the site is from Thong Lane which connects to the A2 to the south and A226 to the north.

Adjacent to the site to the north is the Gravesend Golf Centre and the Gravesend Model Marine and Engineering Society Amusement Park Ride (a model railway). Immediately to the west is the Legends Sport Centre, which houses the Riverview Football Club and the Record Tennis Centres. To the south of the site is the now closed Southern Valley Golf Club. 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.

Gravesend railway station is approximately three miles from the site (10 min journey by car), with services direct and high speed (HS1) services to London St Pancras International and other London terminals. Two main bus routes (480 and 481) 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 site is located within an Area of Archaeological potential 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 Thames Estuary and Marshes SSSI Special Protection Area (SPA) and Ramsar site, located 1,700m to the north.

The entire site is located within Flood Zone 1 (Low Probability) on the Environment Agency (EA) Flood Map for Planning.

The Planning Statement advises that the applicant proposes to redevelop the existing Cascades Leisure Centre and provide new and enhanced facilities. The applicant considers that the existing leisure centre building is dated and in poor condition, resulting in an inability to offer modern, flexible spaces for swimming, health and fitness.

Relevant Planning History

20090517	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.	Permitted	03.09.2009
19900253	Erection of a detached single storey building to form golf shop, 30no. driving bays, catering/ creche facilities, wc accom., office & store, erect. Of 3, 6.4m high pole mounted floodlights, erect. Of boundary fencing varying in height from 2.4m-6m & laying out of associated car parking.	Permitted	22.06.1990
19861041	Retention of tennis pavilion laying out of 28 no car parking spaces and erection of earth bund and associated landscaping	Permitted	18.03.1987

19860844	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 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	Permitted	15.12.1986
19860329	Outline application for the construction of a leisure pool with ancillary accommodation and associated car parking and access.	Approved	24.07.1986
19860829	Change of use of the ground floor of detached two storey building from grounds mans store to bar with toilet accommodation, erection of single store side extension to form that the, 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.	Permitted	20.11.1986
19850435	Application under Regulation 5 of the Town and Country Planning General Regulations 1976 for construction of 4 tennis courts enclosed by 2 no 8 5m high inflatable covers erection of a tennis pavilion 6 no floodlights and 2 7m high fencing layout of access road and car parking for 24 cars and erection of an earth bund and associated landscaping	Permitted	06.08.1983
19770918	Erection of block of 4 no. squash courts with training room	Permission	19.12.1977
TH/2/68/97/D	Change of use to public open space	Permission	07.05.1973
TH/2/68/97B	Erection of changing rooms, squash courts, ancillary accommodation including groundsman's flat and store, together with car parking and laying out open sports facilities	Permission	08/01/1969
TH/2/63/35	Change of use to public open space	Permission (KCC)	

2. Proposal

This application seeks planning permission for the demolition of the existing leisure centre and associated buildings and construction of a replacement leisure centre, associated parking, landscaping and play areas.

The maximum height will be 14.6m, the maximum width will be 101.64m and the maximum depth will be 60.1m.

North elevation (front):



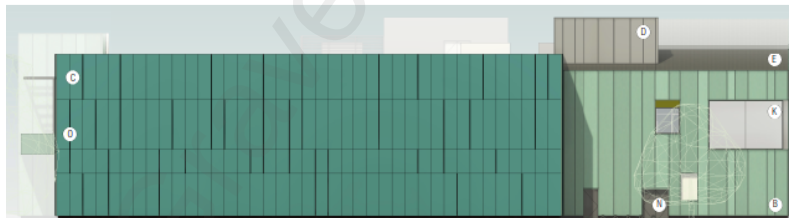
South elevation (rear):



West elevation:



East elevation:



The new sports centre would comprise the following amenities/services:

Ground floor

Leisure Pool
Learner Pool
8 lane 25m swimming pool

Play café
Sauna
Steam room
Changing village
Store rooms
Pool plant room
Staff room
Offices
Kitchen
Soft play
Clip and climb
WCs
Community rooms
Sports Hall

First floor

Casual seating
Two squash courts
A spin studio
Gym changing rooms
Plant room
Two studios
2no. WCs and accessible changing, a server room
Store cupboards
Assessment room
Fitness suite
External terrace

Externally there will be a children's play facilities, an active play activity area, an outdoor gym and trim trail and a recreational tennis and netball court. There will be 257 car parking spaces (15 accessible and approximately 25 with electric charging capabilities), three coach drop off points, relocation of the existing bus stop, one new outdoor tennis/netball court. There will be 13 motorcycle spaces as well as an area of overflow parking area located on the site of 2 redundant tennis courts. This is to accommodate visitors on competition days when there is anticipated to be a large number of spectators visiting the site.

The three redundant tennis courts will be replaced with a multi-use enclosed and floodlit outdoor tennis and netball court. This will also be used for overflow parking associated with regional level swimming galas and indoor sports for spectator viewing to the pool hall and sports hall as demand dictates.

The external materials will use a palette of green, copper, brown and grey coloured aluminium cladding panels to reflect naturally occurring colours found locally together with the riveted metal cladding of aircraft dating back to the period of RAF Gravesend. A dark grey engineered brick with dark grey mortar will serve as the upstand plinth below which is fixed the various cladding systems. The pitched roofs will be covered in a dark grey standing seam roof system. The flat roofs will be finished in a mid-grey single ply membrane and an area above the squash courts and above the entrance canopy will be finished in a built-up sedum roof system. The doors windows and curtain walling are to be polyester powder coated dark grey anthracite colour. For the avoidance of doubt the final details of external facing materials will be subject to an appropriate planning condition.

The sports hall, due to sporting requirements, will have a windowless blank façade and has therefore been dealt with as a distinct part of the building.

The existing accesses to the site will not be altered.

The new leisure centre will be relocated onto the area currently used for visitor car parking. It is proposed the existing leisure centre will remain operational while the new facility is built and temporary car parking provided for centre users will be accommodated in the existing over-spill parking area owned by the council, directly adjacent to the site to the north-west. This location was selected because it had the least impact on existing trees and raised planted bunds, maintains the children's playground and informal kick about play area to the southwestern boundary as well as being naturally screened by trees.

Background

The Council's Indoor and Built Facilities Needs Assessment (2016), which formed part of the Open Space, Sport and Recreation Assessment (2016), outlined that there is a need to consider the financial viability of the Council-owned Cascades and Cygnets leisure centres, given the likelihood of increases in maintenance costs in coming years. Based on the recommendations within the assessment a feasibility study for the future provision of council owned leisure centres within the Borough was undertaken in 2021. This recommended that Cascades be replaced at its existing site. The Council's Sport, Leisure and Active Recreation Strategy 2022-2027 outlines a number of key drivers and ambitions including:

- Provide a swimming facility to meet the Borough's existing and future shortfall in provision;
- Potential for co-location of health and wellbeing spaces;
- Provide greater capacity to generate revenue with the offer of modern facilities;
- Provide attractive facilities for users;
- Achieve greater building efficiency to enable GBC to further deliver its ambition of net-zero operations by 2030; and
- Provide Regional Level Competitive Sports and Leisure facilities.

3. Planning Policy, Development Plan and other Material Considerations

The relevant policies for this proposal are as follows:

Gravesham Local Plan Core Strategy (September 2014)

- 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
- CS14 – Housing Type and Size
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Paragraph 33 of the (NPPF) (2021) sets out those policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and the review found that the adopted

Local Plan Core Strategy (LPCS) is in need of a partial review in terms of Policy CS02 (LPCS) due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the National Planning Policy Framework (2021), the Council will also seek to replace these saved policies via the emerging Local Plan

Saved Policies in the Gravesham Local Plan First Review (November 1994)

- TC7: Other Archaeological Sites (area may have archaeological interest)
- T1: Impact of Development on the Highway Network
- T4: Impact of Development on the Highway Network
- T5: Access to the Identified Highway Network (includes intensification of use of existing)
- P3: Policy for Vehicle Parking Standards

Kent Minerals and Waste Local Plan 2–13 - 30 (as amended by partial review, 2020)

- Policy CSW2: Waste Hierarchy
- Policy CSW3: Waste Reduction

National Planning Policy Framework (2021)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt land
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG4 – KCC Parking Standards (2006).
- Landscape Character Assessment (2009)
- The Kent Downs AONB Management Plan 2021-2026

Other Material Considerations

Other material considerations are capable of being wide ranging and stand to be considered on their merits within the planning balance. Of relevance is national planning policy and guidance as set out in the National Planning Policy Framework (NPPF, 2021) and associated Planning Practice Guidance (PPG).

In terms of achieving high quality design, the National Design Guide (2021) and associated documents are a material consideration. The National Design Guide has been issued by Government as part of its suite of PPG documents in support of delivering well-designed places. Guidance provided in Kent Design is also of relevance given reference is made to it under Core Strategy policy CS19.

The statutory duty under section 85 of the Countryside and Rights of Way Act 2000 also applies, in terms of having regard to the purpose of conserving and enhancing the natural beauty of the Kent Downs AONB in determining the application. In assessing the impact of the proposal on the character and appearance of the area, account needs to be taken of the Gravesham Landscape Character Assessment and outputs from the Gravesham Landscape Sensitivity and Capacity Study.

Other relevant documents include:

- Sport England Playing fields policy and guidance (2018)
- GBC playing pitch strategy (2016)
- GBC leisure strategy (2022-2027)

Gravesham Borough Council recognises the importance of sustainability and on 25 June 2019 at its full Council meeting declared a climate emergency and this includes the target to make the borough Carbon Neutral by 2030.

4. Consultations and Publicity Responses

Consultees

Sport England

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>.

This application falls within the scope of the above guidance as it relates to the creation of a major sports facility.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

The Proposal and Assessment against Sport England's Objectives and the NPPF

The Council's Indoor Sports Strategy 2016 identifies the need for improvements to the Borough's two main sports centres. It 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, 'due to its form it feels dated and tired for a 21st century physical activity opportunity'.

In light of the above Sport England supports the proposal as we consider the proposal addresses an identified need for this facility type and has the potential to be of benefit to the development and encouragement of increased participation in community sport and recreation within the Borough. Particular support is given to, the continuity of sport and recreation on the site during the construction period. The reinstatement within the new centre of a larger and more flexible sports hall that will be able to accommodate a wide range of sports to competition level and wider community events. We welcome the inclusion of indoor cricket practice nets within the hall and would also recommend that the hall is marked out for futsal as this is an identified priority within the Gravesham Local Football Facility Plan 2019 prepared by the FA in partnership with the Council <https://localplans.footballfoundation.org.uk/local-authorities-index/gravesham/gravesham-local-football-facility-plan/>

The provision of an 8 x 25m competition pool together with training pool with removable floor to maximise flexibility and community use in accordance with identified need. The refurbishment of

one long disused outdoor tennis / netball court with sports lighting.

Conclusion

This being the case, Sport England offers its support for this this application, as it is considered to meet the Provide and Enhance Objectives as set out above.

Sport England's support to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Kent Police (Designing Out Crime)

In summary, the submitted Design and Access Statement shows that the Secure by Design principles are being applied to the site and therefore no concerns are raised. The full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=D4A24BA8587C4B89A58063128C25448E

Kent Downs Area of Outstanding Natural Beauty Unit

In summary the Kent AONB Unit consider any potential opportunities for impacts on the setting of the AONB to be relatively low.

The full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=7DB4140C18224F1ABE3A25F79BBC4DB4

KCC Highways

The road junctions have been modelled and have been shown to operate well within the capacity assuming an increased traffic generation. Adequate parking is shown and an overspill car park. Cycle parking is based on existing usage. EV charging facilities are proposed in compliance with local and national standards. Overall, no objections are raised and conditions are suggested.

The full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=1A0D3C8D0AB343069F1CE47273638286

KCC Public Rights of Way Officer

No objection. Full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=FC9B7A683ED245398F53C1D0B5A76DAC

KCC Flood and Water

No objection subject to conditions.

The full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=1A0D3C8D0AB343069F1CE47273638297

KCC Biodiversity

Sufficient ecological information has been provided and there is unlikely to be a significant ecological impact. No objection subject to conditions.

The full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=8C944E2D0BD843CB9A7BA6DC81138966

KCC Heritage

No objection subject to conditions.

Full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=03851FEAC6A84BB681B6D13E45FA235D

National Highways

No objection. Full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=7E5234AF3BD244879356CDB74992D04E

Environment Agency

No objection subject to conditions. Full response can be found here:

https://docs.gravesham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=E7AFC3B53A64415F9B825E03E9E99695

Health and Safety Executive

HSE Planning Advice does not have an interest in the development

GBC Private Sector Housing

No comment to make.

GBC Waste and Recycling

No objection

GBC Environmental Protection

This service has concerns that the noise and ventilation assessments submitted as part of this application were carried out at a time when the details of the plant related to ventilation, extraction, pool treatment etc were not available as such the assessments are considered unsatisfactory as they include no details of the proposed plant and little in the way of recommendations. Supplementary reports will therefore need to be submitted for approval prior to works commencing on site. Full comments are dealt with in the main body of the report below.

GBC Environmental Protection (Commercial Health)

No objection but recommends informatives.

GBC Highways

In summary, concerns are raised in terms of the disabled spaces conflicting with the cycle parking behind. The cycle parking appears substandard measuring 1.8m compared to 2m suggested for a cycle parked at a stand. There is no cycle parking for adaptive cycles such as tricycles or tandems. The coach parking seems impractical for three coaches. The footway links between Thong Lane, the bus stop and the small car park near the entrance appear to have been missed off the drawing. Confirmation is requested that parking bays meet the requirements of SPG4. The access to the east of the building serving staff parking needs to be 6m wide or parking spaces set back 1.2m to achieve a 6m aisle for manoeuvring.

Primary access from Thong Lane to the south during construction is not suitable for HGVs. The Travel Plan is suitable but a more site specific related one will need to be drafted within 6 months of occupation. It should include real time information on the local bus service. A budget should be set aside to implement Travel Plan initiative to encourage sustainable transport.

Paragraph 4.4.13 of the Transport Assessment is inaccurate as the diagram should reflect actual walking distances rather than an as the crow fly's isochrones that does not represent reality. The diagram therefore misrepresents the information it is meant to convey. This means in practice the walking distances will be less as people have to negotiate the twists and turns of the road and public footpath network. Without doing a detailed analysis it is probably a reasonable approximation to assume the 1200m isochrone is a more realistic maximum for people to walk within 20 minutes.

To encourage sustainability bus services should ideally be half hourly or better.

Appendix B Drawing Number 332410895/100/002 Revision PO1 clearly demonstrates via a swept path diagram, the coach parking area is not fit for purpose.

This is not mentioned in the Transport Assessment but to encourage sustainability and walking to the development, there is merit in enhancing the pedestrian crossing facilities on Thong Lane near the pedestrian access.

Apart from the above the Transport Assessment is a robust document and does not raise any further concerns.

The document is basic, and all lighting would have to be conditioned. All external lighting should be switched off no later than half an hour after the facility closes or earlier to give time for the public and staff to clear the grounds. If external sports areas are not in use, then the lighting should be switched off and are best controlled locally as and when required, this approach would also be more sustainable as energy is only consumed when the sport area(s) are in use. If lighting is required for security this should be based on infrared detectors switching on lights as appropriate and discussed with The Bat Conservation Trust.

Neighbouring properties

The planning application has been advertised by press notice, six site notices and individual letters to 41 neighbouring properties with an overall expiry date of 30th January 2023.

Three letters of support have been received. Main comments are:

- The leisure centre needs updating
- Good design
- There should continue to be a health suite provided

- Sporting facilities should be at least as good as the current facility

One letter of objection stating:

The Cascades Community Consultation Report draft version 2 November [sic] 2022 document;

Missing in-depth analysis of respondent qualitative results on facility inclusion.

The survey mentions 'a wave machine' facility without publishing corresponding respondent qualitative figures.

Exclusion of specified facility is not justified or properly explained.

5. Service Manager (Planning) Comments

Principle

The proposal is afforded significant support in policy terms by paragraph 8 and Chapter 8 of the NPPF (2021) given potential benefits which could accrue in relation to health, well-being and promoting active lifestyles. Paragraph 93(b) of the NPPF (2021) also states that in decision making, the Council should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community and paragraph 93(a) advises that planning decisions should plan positively for the provisions and use of sports venues to enhance the sustainability of communities and residential environments. In this instance, the Corporate Plan (2019 – 23) commits the Council to an improved leisure offer and promotes active lifestyles. The proposals are also consistent with the Council's Sport, Leisure, and Active Recreation Strategy (2022 – 27) and Sport England have written in support of the application.

Aside from design and addressing the potential impacts of the development in general terms, a key issue in determining the application is compliance with national planning policy on Green Belt set out in Chapter 13 of the NPPF (2021). This is applied in the rural area of Gravesham by Core Strategy policy CS02 at paragraph 4.2.27. As noted above, Cascades lies beyond the urban area boundary as shown on the adopted Policies Map and is therefore within the rural area.

Policy CS01 of the Gravesham Core Strategy 2014 states that planning applications that accord with the policies in the development plan for Gravesham, will be approved without delay. Unless material considerations indicate otherwise. When considering development proposals with Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF (2021) and the Core Strategy.

Policy CS02 of the Gravesham Core Strategy 2014 priorities development in the urban area as a sustainable location for development. Outside of urban settlements, where Cascades is located, development will be supported where it is compatible with national policies for protecting the Green Belt and policies in the Gravesham Core Strategy 2014.

Policy CS07 of the Gravesham Core Strategy 2014 states that the Council will support the refurbishment and upgrading of existing industrial and commercial premises.

Policy CS08 of the Gravesham Core Strategy 2014 relates to proposals for retail and leisure however, in this case, the proposals are to replace an existing leisure centre rather than providing a new site and therefore the requirements within this policy are not applicable.

Policy CS10 of the Gravesham Core Strategy 2014 states that support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to

the provision of additional infrastructure that improves community well-being.

Policy CS13 of the Gravesham Local Plan Core Strategy 2014 states that the Council will seek to enhance the quality, quantity and accessibility of green space, playing pitches and sports facilities, in accordance with an adequate, up to date and relevant evidence base.

The principle of demolishing the current leisure centre and rebuilding it is therefore acceptable provided all the other policies mentioned above are met.

Green Belt

The application site is located within the Green Belt and the open countryside.

Policy CS02 of the Core Strategy 2014 states that development will be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy 2014.

Paragraph 137 of the NPPF (2021) states that the fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open, with their essential characteristics being their openness and their permanence.

Paragraph 138 of the NPPF (2021) states that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In addition to the above five nationally defined purposes of the Green Belt, Policy CS02 of the adopted Gravesham Local Plan Core Strategy states that the local purposes of the Green Belt will be maintained. Paragraph 4.2.7 of the document sets these purposes as being:

- to maintain the break in development between the eastern edge of Gravesend and the Medway Towns which is one of the few barriers preventing the further eastward sprawl of London and the merging of towns along the southern part of the Thames Estuary;
- to assist in safeguarding the countryside by minimising the expansion of the Borough's rural settlements; and
- to assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet.

Paragraph 147 of the NPPF (2021) sets out that 'inappropriate development' is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 148 of the NPPF (2021) advises that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Any development in the Green Belt is inappropriate unless it falls within one of the exceptions set out in the closed lists contained in paragraph 149 of the NPPF (2021). Exceptions to this are:

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not

conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

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

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Whilst the concept of ‘openness’ when assessing planning applications in the Green Belt is identified in the NPPF (2021) as one of the essential characteristics of Green Belts, ‘openness’ is not formerly defined.

Planning Practice Guidance (PPG) advises that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. Supreme Court decisions have confirmed that “matters relevant to openness in any particular case are a matter of planning judgement, not law” but, by way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

As set out above, when considering whether development is appropriate or inappropriate, a number of the exceptions have the proviso that they “would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development”.

Paragraphs (b), (d) and (g) are applicable to the proposal.

The proposal to provide outdoor sports and recreation is appropriate providing that it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. The outdoor elements of the proposal include the children’s play area, trim trail, netball/tennis court and informal kick about area. These elements have a form that keeps openness, as its primarily low level with good visibility between the elements around them. As such the outdoor sports and recreation part of the proposal are appropriate and none of which will conflict with the purposes of including land within the Green Belt and therefore the outdoor element meets exception criterion (b).

Use of the land and scale

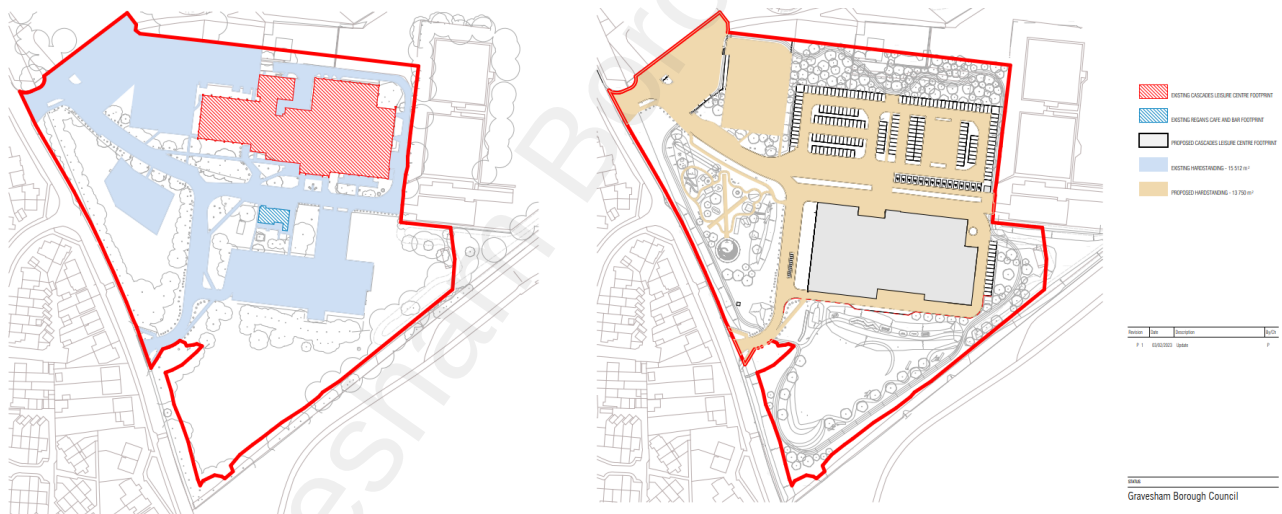
Any replacement building needs to comply with para (d). The land is currently in a leisure use and this will remain as such; therefore no concerns are raised in this regard provided the proposed building is not materially larger than the building it is replacing. There is no definition of ‘materially larger’ provided in the NPPF (2021). Therefore in assessing whether a replacement building is materially larger than the existing one and otherwise acceptable in Green Belt terms, the Council

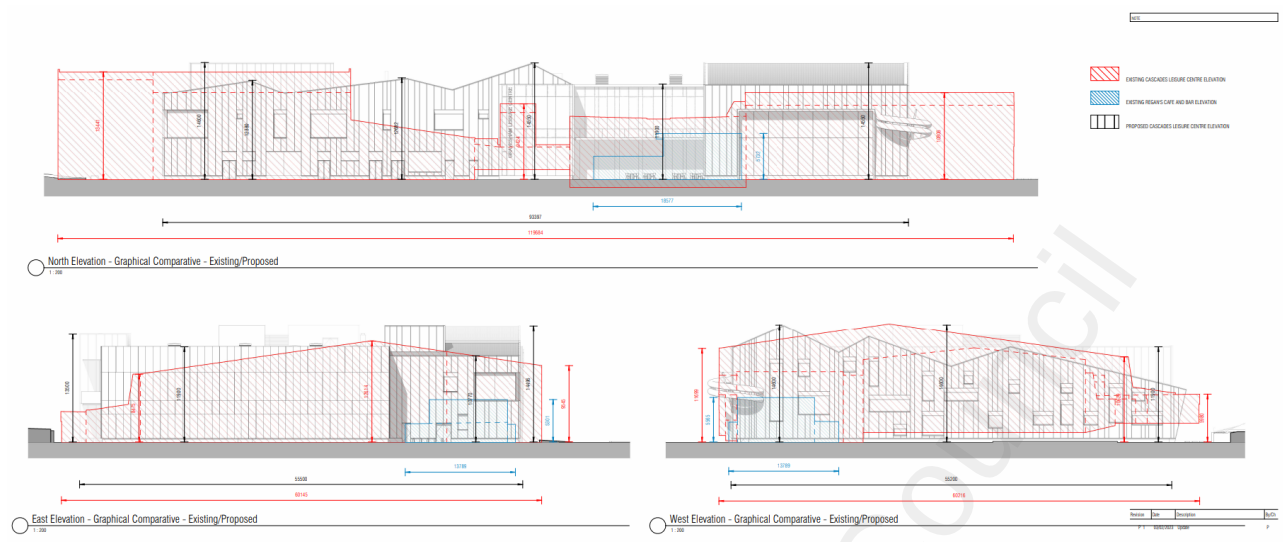
will compare their relative sizes and changes in built form. The location of the replacement building within the site may also be an important factor.

The existing buildings on site comprises of two buildings known as Cascades Leisure Centre and Reagan's Bar. The below table sets out the existing and proposed calculations from the application's figures and drawings. These have been verified by the applicant's agent.

	Existing	Proposed	Difference	%
Approx. floor space measured externally	6950sqm	10628sqm	3678sm	53%
Footprint measured externally	5318sqm	5140sqm	-178sqm	-3%
Volume	43391cubic m	57711cubic m	14,320cubic metres	33%
Hardstanding	15512sqm	13750sqm	-1762sqm	-11sqm

As can be seen from the figures above and the plans below the overall footprint of built form and hardstanding will be reduced by the proposal. At the same time, the volume of the building will increase by approximately one third and the floor area will also increase by 53%. Arguably the floor area has increased due to a better use of the floor space and slight increase to the height of the building.





The impact on the Green Belt is considered in terms of openness which is both visual and spatial. The proposed building occupies less land but is two storeys higher than the existing building. On balance, given that the building will be consolidated into one cohesive building as opposed to many different additions to the original building and the reduction in footprint, the increase in volume is considered not materially larger than the existing building and therefore complies with the exception (d) of paragraph 149.

Previously developed land and Openness

The site is also considered to be previously developed land and therefore can also be assessed with regards to part (g).

This allows limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. The land upon which Cascades sits is undoubtedly previously developed land and therefore the assessment turns to whether or not the proposal will have a greater impact on the openness of the Green Belt.

As discussed above the existing building covers a larger area of land and there is a greater amount of hardstanding compared to what is proposed. The proposed building will be slightly bulkier due to its increased height in places but will be more consolidated into one building than the current arrangement of various buildings and additions. Also, the proposed building will be located closer to the residential settlement which will leave the remainder of the site more open. This will improve the openness within the Green Belt and reduction of encroachment into the countryside. In addition, the location of the building was selected due to its natural screening and minimal impact on existing trees and vegetation as it is being located on the former car park.

Very Special Circumstances

Para. 148 of the NPPF (2021) states that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.' In the case of this application it has been found that the development is appropriate in the Green Belt and therefore very special circumstances do not need to be considered.

The proposed replacement leisure centre and associated outdoor works are considered appropriate development in the Green Belt and therefore accord with Policy CS02 of the Gravesham Core Strategy 2014 and Section 13 of the NPPF (2021).

Character, Design and Landscape

Character and Design

Paragraph 124 of the NPPF (2021) sets out that the creation of high-quality 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. Policy CS19 of the Gravesham Core Strategy 2014 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.

The character of the area is currently mixed. To the west is residential development of predominantly two storey semi-detached dwellings, to the south a closed golf course, to the east is farmland and to the north is a golf centre and farm land beyond. The character of the site itself will not change as the use remains the same. In terms of design, the building will be more coherent compared to the existing which has been added to many times over the years and has limited architectural merit. The proposed development has taken design features from agricultural barns with the differing roof heights and metal cladding which reflects the agricultural nature of the surrounding landscape. The inclusion of a sedum roof will soften the appearance of the building and will further increase biodiversity on the site.

Modern sporting facilities are by their nature large in scale and inevitably larger than the domestic scale of development to the west. The design approach has been to provide a modern building that reflects the site history as an airfield and the Green Belt location in terms of materiality and of traditional Kentish agricultural vernacular in terms of massing and form. The thought behind this approach is to create a centre that will stand out on its own architectural merit whilst at the same time blending in with the local area.

The scale of development is largely dictated by the technical sporting requirements of the primary leisure and sporting spaces comprising pool hall, sports hall, fitness gym and studios.

The proposed building is considered to improve the character and appearance of the site and wider area. The design has been informed by the history of the site and local area as well as Secure by Design Principles. The proposal is therefore considered to conserve and enhance the local built area and meet anti-crime standards in accordance with policy CS19 of the Gravesham Core Strategy 2014 and paragraph 124 of NPPF (2021).

Landscape

Section 15 of the NPPF (2021) highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Policy CS12 of the Gravesham Core Strategy 2014 seeks to protect the green infrastructure within the Borough and states that the overall landscape character and valued landscapes will be conserved, restored and enhanced and the greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs AONB and its setting.

The site is located at the eastern boundary of Gravesham, part of an urban area that leads to the Thames Estuary in northern Kent and beyond the southeast extremity of London. The wider borough has a diverse rural landscape, from the marshes around the Thames in the north, arable

farmlands to the south and east of Gravesend, and downs and woodland in the south. Part of the nationally important landscape of the Kent Downs Area of Outstanding Natural Beauty (AONB) is located on the eastern side of the Borough outside of the application site. There are a number of Public Rights of Ways (PROWs) that cross agricultural fields to the north, east and south of the site and a circuit of permissive paths passing around the football pitches, golf driving range and redundant golf course, which are well-used by local people.

The site is not located within a designated landscape however it is adjacent to the Higham Arable Farmlands Landscape Character Area and is visible from the Kent Downs Area of Outstanding Natural Beauty.

The applicant assessed the site from seven viewpoints and concluded that the building will result in it being more visually prominent from a few short-range viewpoints within the landscape to the south-east but not from long range views.

The overall condition of the surrounding landscape is considered to be poor and the guidelines are to restore and recreate. Whilst the building is not located within a landscape character area, it will be visible from it and, as discussed above, the proposed new building will be moved closer to the urban area and therefore less intrusive of the surrounding countryside. The existing building is of a utilitarian design with various ad hoc extensions and additions. Its replacement, with a district architectural approach, will sit better within the surrounding landscape. The inclusion of additional/replacement hedging will improve the appearance of the site and surrounding landscape.

The site has a rich history dating back to 1932 when it became an airfield and to reflect this historic use and its relation to the landscape the applicant has included the following in the design.

- War memorial and RAF flag on flagpole to be relocated to a more prominent location
- Scaled down airfield runways transect the play area, one marked up to provide the basis for learn to ride cycling surfaces and the second calibrated with distance markers to aid numeracy through play with physical activity
- Amy Johnson would be thematically referenced with the zip wire carriage and structures running from Gravesend to South Africa
- The taxi ways around the airfield has been represented by linking path around the play area
- RAF roundel provide the colour of the wet pour rubber within the play area

As such the proposal would accord with Policy CS12 of the Gravesham Core Strategy 2014 in regards to impact on the Higham Arable Farmlands Landscape Character Area.

AONB

The Local Planning Authority has a legal duty to take account of the purposes of AONB designation in determining the application i.e. the conservation and enhancement of the area's natural beauty. In addition to consideration of the proposal against the local authority's development plan, account should be taken of paragraphs 176 and 177 of the NPPF (2021) and the principles and objectives of the Kent Downs AONB Management Plan, Third Revision 2021 to 2026. The Management Plan is adopted by all the Local Authorities in Kent as their policy for the management of the AONB and for the carrying out of their functions in relation to it. National planning Practice Guidance confirms that AONB Management Plans can be a material consideration in determining planning applications.

While the AONB occupies higher ground to the southeast, there would appear to be limited opportunities for visibility of the site from the AONB, with the exception of one or two points on Shorne Ifield Road where breaks in roadside vegetation do allow for views towards the application site. As views of the site would be filtered by existing trees around the perimeter, and the fact that

development in this location would be seen within the context and backdrop of extensive existing built development and urban infrastructure, the Kent AONB Unit consider any potential opportunities for impacts on the setting of the AONB to be relatively low.

However, it is noted that the change in location of the building and the increase in height may result in the replacement facility being more visible than the existing in views from the AONB. The proposed variation in roof form and elevations which will help break up the perceived mass of building is therefore welcomed. The proposed elevational treatment on the south and east elevations (those with potential to impact on the AONB) include aluminium powder coated colour cladding. The Kent AONB Management Unit recommend ensuring the colour and tone of the panels helps integrate the building into the landscape. In order to minimise potential impacts of the proposed vertical 'Random LED lit strips' on night time effects from the AONB, a condition is recommended to ensure appropriate control.

In summary the landscape impacts are limited to negligible effects on the AONB. Visual impacts of any significance are limited to short-range viewpoints situated south of the site although these are glimpsed and experienced obliquely.

The proposal therefore complies with Policy CS12 of the Gravesham Core Strategy 2014, paragraph 174 of the NPPF (2021) and the objectives of the Kent Downs AONB Management Plan 2021.

Heritage and Archaeology

Policy CS20 of the Gravesham Core Strategy 2014 states that the Council will support proposals which preserve and enhance the significance of the Borough's heritage assets, including the surviving built features and archaeology.

There are no heritage assets within close proximity of site, but the site is within an area of multi-period archaeological potential.

Accompanying the application is an Archaeological Desk-Based Assessment which sets out the known data about the archaeological interest of the site and surrounding area. The report identifies the site has potential for below-ground archaeological remains associated with prehistoric and Romano-British rural settlement and the use of the site during WW2 as part of RAF Gravesend. The site has been subject to past development, and these activities are likely to have impacted below-ground archaeological remains of earlier periods to some extent, reducing potential significance.

KCC Heritage have been consulted and agree with the conclusions of the applicant's archaeological assessment but acknowledge there is potential for archaeological remains to still be present on site. As such a condition will be included to ensure appropriate archaeological field evaluation works are undertaken.

Subject to such a condition the proposed development is considered to accord with policy CS20 of the Gravesham Core Strategy 2014.

Loss of Public House and Residential Accommodation

There is no policy in the local plan that specifically protects the retention of public houses whilst paragraph 84 of the NPPF (2021) does protect community facilities in the rural area, it protects both public houses and sports venues. The existing public house does not complement the objectives of a sports facility to encourage a healthy lifestyle. There are two other similar public house facilities close by and the benefits of the replacement leisure centre therefore outweigh the loss of the public house.

Policy CS14 of the Gravesham Core Strategy 2014 protects the mix of housing in the existing housing stock. The Strategic Housing Market Assessment (SHMA) found that, for market housing there is a significant need for three bedroom properties. The three bedroom flat is ancillary to the public house that will be demolished and will not be replaced and there is no longer a requirement for this ancillary accommodation. Whilst the proposed development will result in the loss of a unit and reduce land supply, the overarching health and wider benefits of a leisure centre outweigh this loss. The Council is directly boosting supply of housing in the Borough through the delivery of affordable homes and market housing. Notwithstanding this a replacement of a dwelling on the leisure site would result in an incongruous form of development out of character with the remainder of the site that does not relate to its surroundings. For these reasons the loss of the ancillary accommodation is not considered to conflict with policy CS14 of the Gravesham Core Strategy 2014 and paragraph 84 of the (NPPF) 2021.

Leisure

Paragraph 92(c) of the NPPF (2021) states that planning decision should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – 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.

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.

The Council undertook a feasibility study for the future provision of council owned leisure centres with the focus on the needs and options over the long term for investment in its facility portfolio. The development of a new-build facility as opposed to the renovation of the existing centre would enable the Council to further deliver its ambition for its operations to be net-zero by 2030. Sport England have written in full support of the proposals. The GBC playing pitch strategy (2016) recognises the importance of the playing pitches at Cascades and these are not being altered as part of the proposed development. The GBC leisure strategy (2022-2027) outlines the Council's plans for the leisure centres.

The proposal to replace the existing leisure offer with improved facilities indoors and outdoors meets with these local and national policies and therefore no objection is raised.

Amenity

The nearest property to the site is over 70m away. This is sufficient distance to not result in any loss of outlook, privacy, sunlight or daylight from the proposal for any neighbouring dwelling. The site will have a larger capacity which will result in additional numbers of visitors/activity from time to time however these are not considered significant enough to impact on residential amenity (see Highways section).

Noise

Policy CS19 of the Gravesham Core Strategy 2014 requires that new development avoids generating adverse environmental impacts, including noise.

The applicant has provided a noise impact assessment. Its findings, based on a 24hr unmanned recording, were that the nearest sensitive receptors, i.e. residential properties on Thong Lane, would not be adversely affected by the development, new traffic flows or plant on the site.

However no details of the plant that will be used on site had been confirmed at the time of the assessment. This is acknowledged in the assessment and therefore the report recommends that the proposed plant does not cause an exceedance of 38 (L_{Ar},Tr dB) at the nearest residential receptor between 07:00 – 23:00 and 34 (L_{Ar},Tr dB) between 23:00 – 07:00.

A condition is therefore proposed to ensure a supplementary noise impact assessment(s) is submitted 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:

- The internal ambient noise levels in all habitable rooms of the nearest residential dwellings to the development shall not exceed the guideline L_{Aeq} 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 be at least 10dB below the existing L_{A90} background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014

The carrying out of a post completion noise impact assessment is also required by condition to demonstrate compliance with the above.

The assessment failed to 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. This needs to be included in the supplementary noise impact assessment. The supplementary assessment should 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.

Opening Times

The leisure centre can potentially cause noise nuisance as a result of the activities taking place such as loud music and people noise from functions, sporting activities, as well as PA systems. In order to mitigate potential unreasonable disturbances to nearby residents a condition is required that indoor and outdoor activities at the venue are restricted to certain times.

Ventilation

Policy CS19 of Gravesham Core Strategy 2024 requires that new development will be located, designed and constructed to avoid adverse environmental impacts, including air pollution.

The applicant has provided a Ventilation Statement, which included information on kitchen, pool hall and general ventilation however final details will be conditioned.

It is considered necessary to secure by condition a requirement for the application to submit a supplementary ventilation assessment prior to works commencing on site, to include details of the proposed ventilation plant, and recommendations to ensure that odour/fume and noise do not cause a nuisance to neighbours.

Contaminated Land

Policy CS19 of the Gravesham Core Strategy 2014 indicates that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise, air, odour, light pollution and land contamination.

Paragraph 174 of the NPPF (2021) indicates that planning decisions should contribute to and enhance the natural and local environment by, amongst other things:

-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; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The application is accompanied by a Phase 1 Environmental report that identifies potential land contamination from the historical uses of the site. Subject to the inclusion of relevant planning conditions to address contamination the proposal complies with Policy CS19 of the Gravesham Core Strategy 2014 and paragraph 170 of the NPPF (2021).

Lighting

The submitted lighting strategy establishes guidelines for lighting and sets parameters within which the resultant lighting scheme can be designed and the identified constraints mitigated. Lighting character zones and suggested illumination levels for the development have been provided.

Whilst floodlighting is indicated to the proposed recreational level tennis and netball court detailed lighting proposals do not form a part of this application. The Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light such that its impact on existing and permitted residential properties is not greater than that found for Environmental zone E3 (Suburban) in table 1 of the ILE guidance notes.

This shall include suitable predictions of light intrusion on the vertical plane demonstrating and plaining

- 5) a) *The source intensity at predicted and existing light sensitive properties' windows (the maximum source intensity to be seen by looking at any of the development's lights)*
- b) *The vertical illuminance at light sensitive properties' windows (how much light falls onto a window).*

In order to ensure that the lighting installed on site does not have an adverse impact on the nearest residential properties a suitable condition will be required for details of all external lighting. For the avoidance of doubt this condition will require the submission of post installation report demonstrating compliance with the above ILP guidance.

Security of Site

Policy CS19 of the Gravesham Core Strategy 2014 requires development to meet anti-crime standards and paragraph 130 of the NPPF (2021) requires the creation of safe and inclusive developments.

The current leisure centre has been targeted in the past by unauthorised encampments on multiple occasions, which caused disruption to the operation of the centre, including loss of income and amenity for the public, as well as criminal damage. It is advised that target hardening measures such as a vehicle height restriction barrier to the carpark, anti-vehicle bollards,

protecting embankments/bunds and other effective measures are installed/implemented as part of the new development to avoid unauthorised vehicle access on the site. To ensure this development creates a safe and secure development a condition will be required for security measures for the development.

Unexploded Ordnance

The site became RAF Gravesend during WWII and became an operational RAF Fighter Command airfield during the Battle of Britain and is identified as at high risk from unexploded ordnance. Official written records identified multiple 50kg and 500kg HE bomb strikes on the airfield on 21-22nd January 1944. There is a lack of clear evidence of the complete removal of all ordnance from the airfield and the limited post-WWII redevelopment of the site.

To ensure risks from Unexploded Ordnance are addressed a suitably worded condition will be included.

Ecology and Biodiversity

Policy CS12 of the Gravesham Core Strategy 2014 states that a net loss of biodiversity will not be permitted, whilst opportunities to enhance, restore, re-create, and maintain habitats will be sought. Where a negative impact on protected or priority habitats/species cannot be avoided and the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

As explained in the Planning Statement, an initial scheme was worked up which positioned the building further south within the Site, parallel with the southern site boundary perimeter tree screen. This was revisited once a Preliminary Ecological Appraisal (PEA) was undertaken and the location of the new building was dictated by achieving the least impact on surrounding ecology being sited on a car park.

The ecological information submitted has been reviewed and sufficient information has been provided. Due to the well-maintained nature of the site, and because the development can achieve a biodiversity net-gain, there will be no adverse impact on biodiversity. A condition is recommended to ensure no adverse effects on bats (and other nocturnal wildlife) is addressed through a relevant lighting condition and soft landscaping scheme to ensure biodiversity net gain. Subject to the recommended condition, the proposals comply with Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and NPPF (2021).

Trees

Policy CS12 of the Gravesham Core Strategy 2014 states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development. Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

Policy CS19 of the Gravesham Core Strategy 2014 states that new development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise.

The Planning Statement explains that the new leisure centre was initially proposed as being located further south within the Site, parallel with the southern site boundary perimeter tree

screen. However, following the undertaking of the Preliminary Ecological Appraisal (PEA) and preparation of the Ecological Constraints Plan, it was reasoned that a new approach was required to the building location, to allow for the retention of as many trees as possible and minimise the impact on the wider site.

The submitted Arboricultural Report identifies 24 individual trees. There will be approx. 26 trees lost to the development, The indicative plan below shows the trees to be removed:



A tree replacement plan has been developed showing the proposed car park featuring an appropriate number of replacement trees which will also serve to mitigate the visual effects of built form in and around the area. The submitted landscape statement indicates the type and species of landscaping that could be undertaken and states that detailed planting plans will be provided at planning condition stage. A condition will be included requiring an accurate tree plan and tree protection measures to be undertaken in accordance with the recommendations of the submitted Arboricultural Impact Assessment and Arboricultural Report.

Construction Environmental Management Plan (CEMP)



Figure 5: Building construction period demises

The submitted Construction Environmental Management Plan (CEMP) is acceptable in terms of highways however there are concerns that the contractor primarily intends to access the site via Thong Lane from the South. Thong Lane is a rural road not suited to the use by HGV's particularly given its width, visibility restrictions and lack of footway. There may also be restrictions imposed should the Lower Thames Crossing be in the process of construction at the same time. It is better for all traffic to enter and leave the site from the north using the A226 to access either Valley Drive (small vehicles) or the A289 and then onto the M2 (lorries) which both give access to the trunk road network.

A condition is recommended that a CEMP is submitted prior to the commencement of works which addresses the highway concerns and the requirements from Gravesham Environmental Protection Services.

Asbestos

The building has asbestos and there is historic water damage to ceilings. Asbestos and the potential danger to human health is specifically dealt with by the Health and Safety Executive (HSE) and is outside the remit of the planning system. All the works proposed on the site affecting asbestos containing materials (ACM) are subject to The Control of Asbestos Regulations (2012). Depending on the nature of any works they may be classed as licensable under the regulations and would need to be carried out by a specialist asbestos contractor who is licensed by the HSE.

Energy and Sustainability

Policy CS18 of the Gravesham Core Strategy 2014 supports proposals that seeks to reduce the overall carbon footprint of the Borough. The policy states that non-residential development proposals of 1,000 sqm and above will be required to meet the BREEAM "excellent" standards of water efficiency and include provision for the collection of rainwater. An Energy and Low Carbon Technology Statement has been provided in support of the application. When measured for Building Regulations Part L compliance, the proposed building will have carbon emissions 45% lower than required and 13 times lower than the existing building. Primary energy use of the proposed development will be 45% lower than a Building Regulations compliant building. The proposed building will have an estimated EPC rating of A, just short of a net zero carbon building, compared to a B (almost C) rating for the existing building.

Heat pumps are proposed for the building as well as the use of natural gas as back up. Heat recovery hot water from showers will be collected and heat will be recovered from the waste water to reduce the energy demand on the hot water required for showers. Microfiltration to treat the pool water rather than traditional sand and filtration. Photovoltaic panels are proposed to generate onsite electricity to assist in providing energy for the heat pumps and other electrical systems within the building. Air handling units will provide ventilation and heat recovery.

The proposed leisure centre incorporates the following measures to secure a highly energy efficient building:

- Heating and cooling provided via heat recovery air source heat pumps;
- Ventilation systems to incorporate high heat recovery;
- Wastewater heat recovery system to reclaim heat from waste shower water;
- Provision of Photovoltaic Panels on the roof;
- Proposed building to be all electric, ensuring the building is carbon zero ready; and
- Making best use of passive measures, such as maximising natural daylight and making use of thermal mass.

In order to achieve BREEAM 'excellent' standards of water efficiency, there will be careful selection of sanitaryware and flow restrictors will be considered if necessary.

Flooding and Drainage

Policy CS18 of the Gravesham Core Strategy 2014 requires that all proposals for development on sites at risk of flooding must be accompanied by a Flood Risk Assessment and the policy sets out the requirements for addressing surface water run-off. 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 financially feasible.

The site lies within Flood Zone 1 which indicates a low risk of flooding.

The use of permeable pavements and a soakaway will ensure that the proposed development will result in a slight improvement to the flood risk of the site.

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Drainage Strategy and understand that surface water will infiltrate via six cellular soakaways and permeable paving will also be utilised across the car park.

Kent County Council do not object to the SuDS strategy but will require further information which will be addressed through an appropriately worded condition.

The previous use of the proposed development site presents a medium risk of residual contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site is located upon Principal aquifer.

The reports submitted in support of this planning application provide confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken.

In light of the above, the proposed development will be acceptable if planning conditions are included requiring the submission of a remediation strategy, carried out by a competent person in line with paragraph 183 of the NPPF (2021).

Without these conditions it cannot be guaranteed that the development will cause or be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Refuse Arrangements

Policy CS19 of the Gravesham Core Strategy 2014 requires new development to incorporate facilities for the storage and recycling of waste generated, further clarification is provided in Planning Guidance on Waste Collection Requirements (2019). In order to ensure this proposal complies with Policy CS19 of the Gravesham Core Strategy 2014 Gravesham Borough Council's Waste and Recycling department have been consulted.

There will be a provision of 26 no. 1100 litre wheeled bins for general waste and recycling and 6 no. 240 litre bins for food waste. The eventual building operator will facilitate all of these services on behalf of the Council. They would typically use a 6x4 26 tonne refuse collection vehicle to service these types of facilities.

There is a service layby situated to the rear of the leisure centre, which provides sufficient space to accommodate refuse collection and delivery vehicles. Access is available only for service vehicles who will then be able to make a left turn directly onto the one way system before exiting the site.

There is no highway objection or objection from Gravesham Waste Services on the proposed refuse strategy for the site.

In summary with regard to refuse arrangements subject to appropriate planning conditions relating to final details of refuse arrangements it is considered the proposal complies with Policy CS19 of the Gravesham Core Strategy 2014.

Highways

The proposed development needs to be considered against Policy CS11 of the Gravesham Core Strategy 2014 which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2021) states at paragraph 105, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2021) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe.

The plans show there is proposed parking provision of 257 spaces, of which 15 are designated disabled spaces, 14 are staff spaces and 25 are existing spaces located in the overspill car park. Additionally, 3 coach parking bays and 13 motorcycle spaces are to be provided. The proposed development will provide 10% of spaces for active charging of electric vehicles, equating to a total of 23 spaces. A dedicated vehicle drop-off bay is located close to the main entrance for assisted drop-off, taxi drop off, coach and minibus drop off.

The proposed development will provide a total of 35 cycle parking spaces (final details will be conditioned). This will be covered and secure provision, situated within close proximity of the

entrance of the new leisure centre.

The road junctions have been modelled and have been shown to operate well within the capacity assuming an increased traffic generation. Adequate parking is shown and an overspill car park. Cycle parking is based on existing usage.

Acceptable levels of disabled parking and cycle parking are shown to be provided however full details of this shall be required by planning condition. These details should show direct access to the footway for disabled persons and cycle parking including parking for adaptive cycles such as tricycles or tandems.

Coach parking for three coaches is also shown however, as above, full details of this arrangement should be provided by condition including pedestrian links between Thong Lane, the bus stop and the small car park near the entrance.

The plans include details of a staff parking area consisting of 14 spaces. In order to ensure these are accessible a condition is required that full details of the parking spaces and manoeuvring areas are provided.

The Travel Plan Framework is a suitable at this stage, although a more specific site related one will need to be drafted prior to the bringing into use of the new leisure centre. This should include details regarding providing real time information on the local bus services within the centre at strategic points, such as the reception/café area and the changing rooms. A budget should be set aside to implement Travel Plan initiatives to encourage sustainable transport, such as discounted entry on presentation of a valid bus ticket.

In conclusion, when considering the parking provision for the site and the impact on the highway network during the schemes' full occupation, the proposed development is unlikely to have significant impact on the highway network which has been confirmed in the applicants transport assessment. As such there is no conflict with local or national planning policy.

Community Consultation

Paragraph 40 of the NPPF (2021) states that local planning authorities should encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.

Paragraph 132 of the NPPF (2021) says that applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community and that applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

The community consultation report explains that the Council's decision to replace Cascades has been developed over a 7-year period and has included a range of stakeholder and community engagement processes in its development. The report lists the range of stakeholder organisations that were engaged in developing the Indoor Sports Facilities Strategy in 2015/2016. It then includes the wide range of consultees that were engaged as part of KKP's work on the leisure feasibility study commissioned in November 2020. To ensure there was sufficient public consultation to support the stakeholder engagement undertaken over recent years, it was decided to progress with a full public consultation process to support the planning submission.

The consultation period ran from 24 October 2022 until 20 November 2022 and yielded 695 responses which is considered a good response. In support of the online consultation and drop-in session was held on 8 November 2022 from noon until 7pm. The results showed clear extensive public support to replace the leisure centre and considered it a community project worthy of

Council investment.

6. Conclusions

The proposed development is deemed to be a sustainable form of development that accords with national and local planning policy and will have no detrimental impact on the openness of the Green Belt,

The proposals will have no detrimental impact on the openness of the Green Belt, surrounding landscape, character of the area, amenity, highway safety or parking. The scheme takes into account the history of the site and incorporates this in its design and play area.

On balance it is considered that the proposal is in accordance with the development plan as a whole and that there are no material considerations which indicate otherwise. In particular, the Council also has concluded that the clear and convincing justification has been given which is required by the NPPF (2021). It is therefore recommended that the proposal can be supported.

Delegated to Service Manager (Planning) to grant Permission subject to the applicant agreeing pre-commencement conditions and finalisation of planning conditions.

Recommendation

The recommendation is for the application to be **APPROVED** Planning Permission subject to the following conditions:

Time Limit

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

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

Approved Plans

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

Regans Café and Bar existing floor plans

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-0821 (proposed elevations south and west)

Drawing no. 3929-ASP-B1-XX-DR-A-0820 (proposed elevations north and east)

Drawing no. 3929-ASP-B1-XX-DR-A-0803 (proposed site plan)

Drawing no. 3929-ASP-B1-XX-DR-A-0802 (existing site plan)

Drawing no. 3929-ASP-B1-XX-DR-A-0801 (site location plan)

Drawing no. 3929-ASP-B1-02-DR-A-0815 (existing first floor plan)

Drawing no. 3929-ASP-B1-XX-DR-A-0850 (3D exterior main entrance view)

Drawing no. 3939-ASP-B1-XX-DR-A-0851 (3D exterior pool hall view)

Drawing no. 3929-ASP-B1-XX-DR-A-0852 (3D exterior community, fitness suite and sports all view)

Drawing no. 3929-ASP-B1-XX-DR-A-0860 (3D interior clip and climb soft play view)
 Drawing no. 3929-ASP-B1-XX-DR-A-0861 (3D interior fitness suite view)
 Drawing no. 3929-ASP-B1-XX-DR-A-0862 (3D interior pool hall view)
 Drawing no. 3929-ASP-B1-XX-DR-A-0863 (3D interior lobby café/view)
 Drawing no. 3929-ASP-B1-XX-DR-A-0840 (site sections 1, 2 and 3)
 Drawing no. 3929-ASP-B1-XX-DR-A-0831 (sections C and D)
 Drawing no. 3929-ASP-B1-XX-DR-A-0830 (sections A and B)
 Drawing no. 3929-ASP-B1-02-DR-A-0814 (existing ground floor plan)
 Drawing no. 3929-ASP-B1-02-DR-A-0813 (existing basement plan)
 Drawing no. 3929-ASP-B1-02-DR-A-0812 (proposed second floor/roof plan)
 Drawing no. 3929-ASP-B1-01-DR-A-0811 (proposed first floor plan)
 Drawing no. 3929-ASP-B1-00-DR-A-0810 (proposed ground floor plan)
 Drawing no. 22/043/SL1 rev 02 (construction sequence site layout 1)
 Drawing no. 22/043/SL2 rev 02 (construction sequence site layout 2)
 Landscape and Visual Impact Assessment (ref GLC-COL-XX-XX-DO-L-002) by colour
 Drawing no. GLC-COL-00-XX-DR-L-6002-002 rev 01 (Topographic Survey)
 Drawing no. 2333-COL-XX-XX-DR-L-1000 rev 06 (Landscape General Arrangement Plan)
 Drawing no. GLC-COL-00-XX-DR-L-6002-001 rev 01 (Site Context)
 Drawing no. GLC-COL-00-XX-DR-L-6002-005 rev 01 (Landscape Character)
 Drawing no. GLC-COL-00-XX-DR-L-6002-006 rev 02 (Zones of Theoretical Visibility)
 Drawing no. GLC-COL-00-XX-DR-L-6002-007 rev 01 (Landscape Framework)
 Drawing no. GLC-COL-00-XX-DR-L-6002-004 rev 01 (Landscape and Planning Designations)
 Drawing no. GLC-COL-00-XX-DR-L-6002-003 rev 01 (Heritage Designations)
 Drawing no. GLC-COL-XX-XX-DR-L-6026 rev P01 (photographic viewpoints – viewpoint 17)
 Drawing no. GLC-COL-XX-XX-DR-L-6025 rev P01 (photographic viewpoints – viewpoint 16)
 Drawing no. GLC-COL-XX-XX-DR-L-6024 rev P01 (photographic viewpoints – viewpoint 15)
 Drawing no. GLC-COL-XX-XX-DR-L-6022 rev P01 (photographic viewpoints – viewpoint 13)
 Drawing no. GLC-COL-XX-XX-DR-L-6021 rev P01 (photographic viewpoints – viewpoint 12)
 Drawing no. GLC-COL-XX-XX-DR-L-6020 rev P01 (photographic viewpoints – viewpoint 9)
 Drawing no. GLC-COL-XX-XX-DR-L-6057 rev P01 (photographic viewpoints – viewpoint 20 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6056 rev P01 (photographic viewpoints – viewpoint 17 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6055 rev P01 (photographic viewpoints – viewpoint 16 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6054 rev P01 (photographic viewpoints – viewpoint 15 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6052 rev P01 (photographic viewpoints – viewpoint 13 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6051 rev P01 (photographic viewpoints – viewpoint 12 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6050 rev P01 (photographic viewpoints – viewpoint 09 – proposed AVR level 2)
 Drawing no. GLC-COL-XX-XX-DR-L-6057 rev P01 (photographic viewpoints – viewpoint 20)
 Drawing no. 3929-ASP-B1-XX-DR-A-0882-P1 (comparative information – elevations)
 Drawing no. 3929-ASP-B1-XX-DR-A-0881-P1 (comparative information – hardstanding)
 Drawing no. 3929-ASP-B1-XX-DR-A-0880-P1 (comparative information – footprint)
 Drawing no. 3929-ASP-B1-XX-DR-A-0883 (comparative information – Regans Bar)

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

Prior to Commencement

Construction Environmental Management Plan (CEMP)

3. No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The document shall be based on the submitted Construction, Environmental Management Plan and cover all environmental impacts from the clearance and construction phases of this development including details of the following, as well as any other measures deemed reasonably necessary:
- (a) Suitable mitigation measures to minimise noise pollution and vibration during the construction phase including the insulation of fixed plant and the silencing of vehicles and mobile machinery
 - (b) A Dust Management Plan to minimise emissions to air and to prevent nuisance from wind-blown dust including fencing and the dampening down with water of excavated construction and cover materials on site, and other areas traversed by plant vehicles and machinery
 - (c) A Construction Traffic Management Plan covering:
 - Means of direct access to the site from the adjoining maintainable public highway
 - Surface treatment of the access to avoid spill of migratory material on to the maintainable public highway
 - Details of numbers and routeing of construction and delivery vehicles to / from site
 - Timing of deliveries and waste movement
 - Loading and unloading of plant and materials away from the maintainable public highway
 - Parking and turning areas for construction and delivery vehicles and site personnel
 - Type and location of wheel washing and chassis cleaning facilities
 - Temporary traffic management / signage
 - (d) Details of the location of the proposed construction compound
 - (e) Details of security fencing and other site security measures
 - (f) Details of stockpile areas for building materials or for fill or removed topsoil
 - (g) A Construction Drainage Design Plan to identify the required devices to prevent construction run off from flowing into existing drainage
 - (h) Ecological mitigation measures
 - (i) Measures to be undertaken to protect any public sewers and water apparatus
 - (j) Details of vibration monitoring and mitigation during any necessary piling works
 - (k) Details of the location, form and visual appearance of any site hoardings along road frontages and footpaths including decorative displays and facilities for public viewing, where appropriate
 - (l) Details of pest control
 - (m) Details of temporary construction or security lighting; and
 - (n) Monitoring and review provisions with the Local Planning Authority

The construction of the development shall adhere at all times and be carried out in full accordance with the relevant approved document or any subsequent variations that may be approved in writing by the Local Planning Authority.

Reason: To ensure that a suitable programme of all works is set out from the commencement of development, to demonstrate that the free flow of traffic on the highway and to minimise the impact on local residents and businesses, in accordance with policies CS11, CS12 and CS19 of the Gravesham Core Strategy 2014.

Foul Drainage Strategy

4. No development shall take place until a foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented (with a connection to foul sewer), has been submitted to and approved by, the local planning authority in consultation with the Southern Water. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy. No use premises can take place until the installed scheme is confirmed as meeting the agreed specifications.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable

risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework 2021.

Contaminated Land Strategy

5. No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:
- a. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors; and
 - potentially unacceptable risks arising from contamination at the site.
 - b. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - c. The results of the site investigation and the detailed risk assessment referred to in (b) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 - d. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework 2021.

Sustainable Surface Water Drainage Scheme

6. No development approved by this permission shall be commenced until a scheme for sustainable surface water drainage has been submitted to and approved, in writing, by the Local Planning Authority. The detailed drainage scheme submitted shall
- (i) demonstrate that both the rate and volume of run-off leaving the site post-development will be restricted to that of the existing site during any rainfall event (up to and including the climate change adjusted 100yr critical storm)
 - (ii) demonstrate that the existing on-site surface water flow-routes and accumulation points will not be altered in such a way that the development places property at risk from flooding during any rainfall event, up to and including the climate change adjusted critical 100yr storm,
 - (iii) demonstrate that infiltration features are not located on parts of the site where contamination might be present
 - (iii) include a timetable for its implementation, and
 - (iv) include a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

The surface water drainage scheme shall thereafter be implemented in full prior to first residential occupation of the development and thereafter maintained and managed in accordance with the approved scheme.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal; to ensure that the development does not contribute to, or is not put at risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants and to ensure ongoing efficacy of the drainage provisions, in accordance with policies CS18 and CS19 of the Gravesham Core Strategy 2014.

Arboricultural Impact Assessment

7. No development shall take place until an arboricultural impact assessment and arboricultural method statement, including a tree protection plan and protection measures has been submitted to and approved in writing by the Local Planning Authority. The documents shall include details of the location of service cabling for EV charging points and lighting, the location of pipework for SUDs and proposed surface water sewers, as well as details of how the widened paths will be constructed and the full extent of repairs/alterations to the parking areas. The tree protection plan should also take account of where the site compound will be placed during the construction phase including access, parking and storage. The tree protection measures shall thereafter remain in place throughout the construction phase and the development shall be implemented in accordance with the details once approved.

Reason: Required prior to commencement of development to ensure no irreversible detrimental harm to the existing tree and in accordance with Policy CS12 of the Gravesham Core Strategy 2014.

Post Demolition

Archaeology

8. The applicant, or their agents or successors in title, shall secure the implementation of the below post demolition and prior to building works taking place:
 - i. archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority; and
 - ii. following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation, recording and dissemination of information about the site, in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ and/or by record and the delivery of public information about the history of the site in accordance with policy CS20 of the Gravesham Core Strategy 2014.

Prior to Above Ground Works

Play equipment

9. Prior to the commencement of any above works, details of the play equipment 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 prior

to the occupation of the development hereby approved 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.

Biodiversity Enhancement

10. Prior to the commencement of any above ground works details of how the development will offset biodiversity loss/enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include a native species-only landscape plan and retention of felled trees on-site. The approved details will be implemented and thereafter retained.

Reason: In accordance with policy CS12 of the Gravesham Core Strategy 2014 and Section 15 of the National Planning Policy Framework 2021.

Noise Assessment

11. 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 the boundary of any noise sensitive property meets the requirements laid down in BS4142:2014 “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 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.

Materials

12. Prior to the commencement of any above ground works on any particular phase of development, details and samples of all external facing materials to be used on the buildings within that phase hereby approved (to include on site sample panels where requested by the Local Planning Authority) shall be submitted to and approved, in writing, by the Local Planning Authority. The details shall substantially accord with the details illustrated and annotated on

the approved drawings and indicated on the approved Design and Access Statement and, where applicable, shall include the following details:

(i) aluminium cladding; (ii) brick detail; (iii) glazing panels; (iv) glass fibre (for flumes); (v) timber pergola details; (vi) entrance canopies; (vii) front doors; (viii) LED strips.

The development shall be implemented in accordance with the approved details.

Reason: In order to ensure an acceptable standard of development upon completion, in accordance with policy CS19 of the Gravesham Core Strategy 2014.

Crime Prevention Measures

13. Notwithstanding the details shown on the approved plans, submitted documents and application form, before any above ground works commence, details of crime prevention measures according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED) shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to first use of the development.

Reason: To ensure the development protects the environment of the site and its locality generally, in the interest of security, crime prevention and community safety and is in accordance with Policy CS19 of the Gravesham Core Strategy 2014.

Post Occupation

Demolition of existing building

14. The existing building on the site (Cascades Leisure Centre and Regan's Bar) shall be demolished and all arising materials shall be removed from the site within six months of the opening of the new leisure centre hereby approved.

Reason: To ensure that only one building remains on the site therefore protecting the surrounding Green Belt and also in order for the parking areas to be provided, in accordance with policies CS02 and CS19 of the Gravesham Core Strategy 2014.

Prior to First Use

Refuse Arrangements

15. Prior to any part of the permitted development being occupied or used, and notwithstanding the details shown on the approved plans, submitted documents and application form, details of the refuse arrangements along with a refuse collection management plan shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall ensure adequate provision for non-recyclable waste, food waste and recyclable waste and security arrangements for the refuse stores. The development shall be carried out in accordance with the approved details prior to first use of the development hereby permitted and shall thereafter be retained for such purposes at all times.

Reason: In order to ensure the development is served by a suitable refuse storage area in the interest of amenity and in accordance with Policy CS19 of the Gravesham Core Strategy 2014.

Kitchen Odour Fume Control

16. Prior to the installation of the kitchen a scheme shall be submitted in writing to the Local Planning Authority for approval in relation to cooking odour/fume 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)”.

Full details of proposed extraction system to deal with grease and odour control should include:

- a) Plans and details of all duct work (internal and external) and equipment.
- b) Plans showing the location/position of the external flue/discharge stack, including its position in relation to neighbouring properties and window openings.
- c) Details of all grease filtration and odour control including the manufacturer’s specification/data sheets. This includes the canopy.
- d) Details, including manufacturer’s specification/data sheets of the fan.
- e) Details of proposed routine cleaning and maintenance of the system, and the service requirements of the installed odour control system, including details of system access panels and confirmation that they will be grease tight.
- f) Details of the type of food to be cooked, the cooking time per day; and the type of cooking appliances to be used. Where the end user is not yet known, the extraction system shall be designed for a ‘very high’ grease content, a ‘very high’ level of odour potential and a ‘very high’ smoke content (EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)).

Install and commission the extract system using a competent ventilation engineer in accordance with approved details. Provide a commissioning report to the LPA to verify the installation, ensuring minimum discharge rates are included.

The extraction and odour/fume control equipment shall be maintained and operated in compliance with the approved scheme.

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

External Lighting

17. Prior to occupation, an external lighting design plan taking into account biodiversity shall be submitted to, and approved in writing by, the local planning authority. The plan will incorporate the measures detailed in table (page 30) of the Preliminary Ecological Appraisal (Lloydbore December 2022). For the avoidance of doubt this should include details of lighting switch off times for the entire site. All external lighting will be installed in accordance with the specifications and locations set out in the plan and will be maintained thereafter.

Reason: In accordance with policy CS12 and CS19 of the Gravesham Core Strategy 2014 and Section 15 of the National Planning Policy Framework 2021.

Soft Landscaping Scheme

18. 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 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.

Hard Landscaping Scheme

19. Prior to the first use of the development herein approved, full details of a hard 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 finished ground levels, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, all paving and external hard surfacing, and services (including drainage), tree grilles, minor artefacts, and structures (seating, refuse receptacles and raised planters).

The development shall be implemented in accordance with the approved details and timetable.

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

EV Charging

20. Prior to their installation full details of the proposed EV charging points including their location shall be provided within three months of the substantial completion of the new car park.

Reason: In the interests of sustainability in accordance with paragraph 112e of National Planning Policy Framework 2021.

Verification Report (Contaminated Land)

21. Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to human health or the water

environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework 2021.

Noise Assessment

22. 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 LAmax 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 be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014

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.

Cycling Storage

23. Prior to the first use of the development herein approved details of the cycle parking provision shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking shall be implemented in accordance with the approved details prior to first use and shall thereafter be retained.

Reason: To ensure the provision and permanent retention of bicycle spaces in accordance with Policy T1 and T4 of the Gravesham Local Plan 1994.

Car Parking

24. Within three months of the demolition of the main Cascades building the area shown on the submitted layout as vehicle parking space shall be provided, surfaced and drained. Thereafter it shall be kept available for such use and no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking or re-enacting that Order) shall be carried out on the land so

shown or in such a position as to preclude vehicular access to this reserved parking space.

Reason: Development without provision of adequate accommodation for the parking or garaging of vehicles is likely to lead to hazardous on-street parking and in accordance with Policies T1 and T4 of the Gravesham Local Plan 1994.

Travel Plan

25. Notwithstanding the submitted Travel Plan, a revised Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the bringing into use of the leisure centre herein approved. Implementation of those parts identified in the approved Travel Plan as being capable of implementation shall then be complied with as long as any part of the development is in use.

Reason: To ensure the sustainable transport objective related to the development of this site and to reduce potential impact on the surrounding area in accordance with Policy CS11 of the Gravesham Core Strategy 2014 and T1 of the Gravesham Local Plan 1994.

On-going Conditions

Unexploded Ordnance

26. If, at any time during development, high risk UXO not previously identified is encountered / found to be present on site further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a revised and/or additional UXO risk management and mitigation programme / plan is submitted detailing how the high risk UXO not previously identified shall be dealt with, and is approved in writing by the Local Planning Authority

Reason: To ensure that the risks from site wide unexploded ordnance to future users of the land and existing neighbouring land are eliminated and or minimised to ensure that development can take place without unacceptable risk to workers and neighbours including any unacceptable major disruption to the wider public on and off site that may arise as a result of evacuation/s associated with the mitigation of UXO.

Hours of Use

27. The operating hours of the leisure centre herein approved shall be restricted to those hours between Monday to Saturday 6am to midnight on Mondays-Saturdays and between 8am to 10pm on Sundays and Bank Holidays.

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

Outside activities

28. No outdoor activities shall take place outside of 8am and 10pm on Mondays - Saturdays and outside of 9am to 8pm on Sundays and Bank Holidays.

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

Surface Water Infiltration

29. Where infiltration is to be used to manage the surface water from the development hereby

permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

Reason: To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework 2021.

Drainage Systems

30. No drainage systems infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework 2021.

Foundations

31. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework 2021.

Watching Brief (Contamination)

32. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 174 of the National Planning Policy Framework 2021.

Energy Efficiency

33. 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. 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.

Use Class

34. The development herein approved shall remain in use as a sports centre/indoor swimming pool and no change of use whether or not permitted under the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking and re-enacting that Order with or without modification) and the Town and Country Planning (Use Classes) Order 1987 (as amended) shall be carried out unless planning permission has been granted on an application relating thereto.

Reason: To enable the Local Planning Authority to control such development in the interests of amenity and to protect the loss of the leisure facility in accordance with policies CS08 and CS19 of the Gravesham Core Strategy 2014.