

Planning Policy Statement

For

PROPOSED RELOCATION OF THE 13th HOLE IN RESPONSE TO SAFETY CONCERNS

AT

**Mid Kent Golf Club, Singlewell Road,
Gravesend DA11 7RB**

Version 1

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EUROPEAN INSTITUTE OF GOLF COURSE ARCHITECTS

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1. PLANNING POLICY CONSIDERATIONS

The following section outlines the consistencies between the proposal at Mid Kent Golf Club and the applicable policies of the National Planning Policy Framework (2021) and Gravesham Local Plan Core Strategy (2014).

1.1. National Planning Policy Framework (NPPF)

The Application Site has no specific designations, and the following policies are of relevance to this proposal:

1.1.1. Achieving Sustainable Development (Chapter 2)

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. *So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.*

The presumption in favour of sustainable development

11. *Plans and decisions should apply a presumption in favour of sustainable development.* Consistencies between Proposal and Chapter 2

The proposal is consistent with Chapter 2 of the NPPF in the following ways:

- a. The proposal will provide modern facilities that will encourage the maximum golf and leisure developmental outcomes with the associated benefits to health and wellbeing;
- b. Mid Kent Golf Club will be able to provide safer and better facilities and opportunities for the local community and sports organisations to participate in sport and physical activity for health improvement and development of their skills, particularly amongst low participant groups;
- c. The proposal will ensure that the existing natural environment is not harmed;
The proposal, prepared in close cooperation with ecological consultants, which results in a net biodiversity gain.

1.1.2. Making effective use of land (Chapter 11)

119. *Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

120. *Planning policies and decisions should:*

- (a)** *encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
- (b)** *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
- (c)** *give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- (d)** *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*
- (e)** *support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-*

designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

1.1.3. Consistencies between Proposal and Chapter 11

Mid Kent Golf Club's development proposal is consistent with Chapter 11 of the NPPF (2021) in the following ways:

- a. The proposal will provide access and opportunities for outdoor sport and recreation while retaining and enhancing and improving the landscape, visual amenity and biodiversity of the course;
- b. The planting plan will contribute to a low carbon future; and
- c. The proposal creates an opportunity to achieve net environmental gains through the creation of new habitats.

The club regard the proposals as a way of improving the business through the investment and development of the facilities within its ownership (safer) and at the same time improving the facilities on offer to members and visitors through a new hole design.

1.1.4. Conserving and Enhancing the Natural Environment (Chapter 15)

174. *Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- (a)** *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- (b)** *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- (c)** *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- (d)** *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- (e)** *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- (f)** *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

Habitats and biodiversity

179. To protect and enhance biodiversity and geodiversity, plans should:

- (a)** Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- (b)** promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

180. When determining planning applications, local planning authorities should apply the following principles:

- (a)** if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- (b)** development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- (c)** development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- (d)** development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- (a)** mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

- (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- (c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

187. *Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.*

188. *The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.*

1.1.5. Consistencies between Proposal and Chapter 15

Mid Kent Golf Club development proposal is consistent with Chapter 15 of the NPPF (2021) in the following ways:

- a. There is virtually no change of landscape character / openness as a result of the proposals and the new proposals should be seen in the context of the overall existing golf course character and environment.
- b. The proposal protects and enhances the landscape by providing additional habitat on completion of the project;
- c. Net gains are provided for biodiversity through habitat protection, creation and connectivity;
- d. The proposal is appropriate for its location and will integrate with existing businesses and community facilities the site has been used for golfing activities and is in harmony with existing businesses, surrounding activities and community facilities;
- e. The proposal will not contribute to noise or light pollution and control measures will be in place to protect against possible dust and noise impacts during the construction phase of the project;
- f. No adverse impacts on health or quality of life are expected; rather this proposal will contribute to well-being;
- g. The proposal will continue to integrate effectively with existing businesses and community facilities as it is considered that this proposal is an acceptable use of land and no change of use is required due to the existing golf facilities;

Comments and Discussion:

Grading, grass areas, sand bunkers and wildflower seeding are all in keeping with the golfing environment. When complete, the visual appearance will be similar to existing fine sports turf and character of a golf course.

In terms of the visual impact of the grading works, the landscaped elevations will be similar to those already on the course in order to maintain continuity of design and character.

The proposals will not create any excessive levels of height or gradient change. As can be seen from the sections, the grading does not appear incongruous in the golfing landscape as subtly rolling. The proposals accord with good golfing design and safety practice and represent the minimum required to achieve the design and safety desires of the brief.

On this basis, it is considered that the proposals are complimentary to the built features within the golf club and will not compromise the views from any onlookers.

1.2. Gravesham Local Plan Core Strategy (2014)

The relevant policies include:

Policy CS13: Green Space, Sport and Recreation

The Council will seek to make adequate provision for and to protect and enhance the quantity, quality, and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base. A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on-site. However, where this is not possible because of the site size, location or other specified circumstances, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space.

Consistencies between Proposal and Policy CS13

The design proposals help to maintain and enhance the quality of this important sports facility for the local community and make it safer.

Policy CS18: Climate Change

Flood Risk

With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding.

Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests.

The Council will prioritise the maintenance, improvement or replacement of flood defence infrastructure over other land uses where relevant. In addition to meeting their own flood defence and management needs, the Council will expect new development to take advantage of opportunities to reduce the causes and impacts of flooding from all sources where it is technically and financially feasible.

Sustainable Drainage and Surface Water Run-Off

The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:

- Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and*
- Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.*

Consistencies between Proposal and Policy CS18

The application site does not fall within an area at risk of flooding (Flood Zone 1) and does not impact on any defined surface water flows as defined by the Environment Agency.

The site is under a hectare and therefore a flood risk assessment is not a requirement of planning.

As part of best practice for the construction of golf greens and tees a system of sub surface drainage pipes together with positives falls will be used to shed water from key playing surfaces into swales and attenuation basin located to the side of the hole (in the roughs).

There will be no increase risk of flooding outside of the site as a consequence of the proposed works.

There would not be a risk to the quantity and quality of surface and ground waters, or impediment to groundwater flow as a result of the proposed works.

There would be no risk of flooding on site or elsewhere as a result of impediment to the flow of storage or surface water.

Policy CS19: Development and Design Principles

New development will be visually attractive, fit for purpose and locally distinctive. It will 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 design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

- Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;*

- New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use,*
Gravesham Local Plan Core Strategy Adopted September 2014

including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;

- New development will be located, designed and constructed to:*
- safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;*
- avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and*
- not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;*
- The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;*
- New development will be designed in an inclusive way to be accessible to all members of the community;*
- New development will provide appropriate levels of private and public amenity space;*
- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;*
- Car parking will be well related to the development it serves;*
- 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;*
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;*
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;*
- New development will incorporate appropriate facilities for the storage and recycling of waste; and*
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.*

Consistencies between Proposal and Policy CS19

The proposed relocation of the 13th hole has the specific intention of addressing the current risk of stray golf shots from escaping onto third party property. The new location of the hole conforms to current safety guidance for golf holes with regards to holes adjacent to boundaries. In this respect the proposals safeguard the neighbouring properties and its occupants.

The scale and extent of the new golf course features (greens, tees, bunkers, fairways and golfers paths) are consistent with the existing golf course features surrounding the new hole. In this respect the new development is visually attractive, fit for purpose and conserves the character of the existing landscape.

The new proposals include measures to protect and enhance the natural environment. On the recommendations of the consulting ecologist, new native fescue grassland and native wildflower seeding is proposed which will ensure the project increases the biodiversity of the site.

The proposals will include typical hard landscape features and furniture found on a golf course, namely golfers paths, flags, tee markers.

There will be no adverse environmental impacts resulting from the building of the golf hole, including no impact from pollution and no risk to the water environment or increase in water usage.

2. SUMMARY AND CONCLUSION

2.1. Summary

The golf club needs to address the current safety issue concerning the 13th hole. By changing the location of the teeing area and relocating the green complex there is a change in the angle of the golfers shot to such an extent that risk to private property falls in line with current guidance on the positioning of golf holes in relation property boundaries.

This can be done in accordance with National and Local Plan policy.

2.2. Conclusion

Given the information provided and policy analysis , it is therefore respectfully requested that this proposal should be supported by the planning authority.