



Application: 20221223
Your Reference:

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

To: **Tonbridge & Malling Borough Council**
Gibson Building, Gibson Drive
Kings Hill
West Malling
Kent
ME19 4LZ

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Badgells Wood Camping**
White Horse Road
Harvel
Gravesend
Kent
DA13 0UF

and being **Tonbridge & Malling Borough Council Consultation TM/22/01982/FL - Replacement of existing camp site reception and shop facilities with a new site reception hub; replacement of site manager's mobile home with a permanent dwelling house; erection of a timber dining canopy structure; erection of new ablution block and upgrading of existing facilities, erection of open sided education space shelter; installation of six timber holiday cabins; associated alterations to parking facilities and services infrastructure and the variation of Conditions 1 and 3 of TM/17/00760/FL to enable all year round occupation of the new site manager's house and use of reception hub and timber holiday cabins all year round (camping to remain seasonal)**

Referred to in your application dated 2 November 2022.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

1 Gravesham Borough Council notes that the site is within the Green Belt, in the Kent Downs Area of Natural Beauty (AONB), in close proximity to the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI), a Local Wildlife Site and part of the site is Ancient Woodland. It is not a sustainable location for new development.

It is noted in the planning submission that the applicant recognises that organised tourism uses such as caravan parks and camp sites are held by case law to not represent a form of outdoor sport, recreation or leisure, and as a result, tourism related buildings and structures cannot be treated as 'appropriate development' within the Green Belt.

Any new built development or replacement buildings that are materially larger as in this case are inappropriate development contrary to section 13 of the National Planning Policy Framework (NPPF) 2021. This is also accepted by the applicants.

Conversely a number of very special circumstances are advanced which the applicants argue are compelling to outweigh any harm to openness and functioning. It is also noted that the applicant also argues that the proposals are acceptable in all other respects with no potential harm to highway safety, local residential amenities, visual amenities, wildlife and habitat or sustainability.

It is considered that some of the matters that are suggested by the applicants as amounting to very special circumstances (such as the site having wartime concrete bases, the use of ground-breaking technology or being a registered site with the 'Duke of Edinburgh Awards' scheme) do not in the Borough Council's view necessarily amount to very special circumstances that might outweigh the harm to openness, and it will be a fine judgment that Tonbridge and Malling Borough Council will have to make as to whether they conclude that sufficient weight can be given to very special circumstances and whether in their view the harm to openness of the Green Belt or any other harm are overriding considerations.

Tonbridge and Malling Borough Council will need to judge the likely harm to the landscape in what is a landscape area of national significance and the GBC Planning Authority notes and supports the concerns that have identified by the Kent Downs AONB Unit.

The proposals have the potential to impact on the Borough of Gravesham if they result in future pressure to expand the activities on the site and increase further the extent of built development and involve additional traffic on the rural roads within the Borough. Any proposals to remove seasonal use and allow for permanent residential accommodation should be strongly rejected.

The Council's Highways Development Management Officer advises that the development is not in a sustainable location, and whilst the dwelling may be for an employee on site saving the commute, it is not suited for a family. There are no footways in the area and cycling will not be attractive in inclement weather or in darkness. Assuming that secure cycle parking is provided. I would suggest a one bed or perhaps two bedroom is more appropriate.

Secure and covered cycle (including adaptive) parking should be provided for both the wardens lodgings and new cabins at the rate of one space per bedroom as it is doubtful cyclists would be occupying all the cabins at the same time. Cycle parking should also be equipped with suitable charging provision for cycles with batteries in the frame.

The Borough Council would urge that due consideration is given to local opinion and that consultation with and the views of the adjoining parishes within Gravesham and those of neighbouring ward councillors are taken into account.

Tonbridge and Malling Borough Council are thanked for consulting the Borough Council.

Dated this 1st day of December 2022

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