



Delegated Report

Planning Application

Application no:	20211484
Location:	Rochester And Cobham Park Golf Club Park Pale Shorne Rochester ME2 3UL
Description:	Erection of a new single storey trolley store to be located within the existing car park.
Applicant:	Mr John Aughterlony, Rochester And Cobham Park Golf Club LTD
Site Visit Date:	23.12.2021; Previous site visit - 08.12.2017

Site Description

The Rochester and Cobham Golf Course is located at Park Pale on the south side of the A2 trunk road, Cobham. It has an access from Brewers Road Shorne via Park Pale Lane and a bridge over the A2.

The club building is a modern building and contains a main two-storey element with plain tiled Kentish hipped roof and brick exterior and timber windows with a linked building used as a club pro shop and which contains a small clock tower. There are parking areas to the east of the building and the course lies principally to the west of the building.



The golf course is a parkland type 18-hole course currently measuring 6,597 yards from the back tees and playing to a par of 71.

The landscape of the golf course being adjacent to Cobham Hall, and which contains Repton's seat, is of high historic importance as well as being within an Area of Outstanding Natural Beauty (AONB). It is within a Green Belt area.

Rochester Golf Club, as it was originally named, was first established in 1891 as a 9-hole course at Oakleigh Farm Higham and moved to the Deer Park at Cobham Hall after the First World War in 1920.

Planning History

A planning history search has revealed the following planning records in chronological order:

Ref No	Description and Site	Decision	Date
19480121	Erection or making of shower-bath accommodation	Permission	14.12.1948
19500192	Erection of trolley garage	Permission	10.01.1951
19580628	Erection of extension to form men's locker room and ablution block	Permission	07.01.1959
19740125	Application for the extension of the golf playing area.	Permission	19.05.1977
19740126	Outline application for the erection of a new golf club house.	Permission	13.11.1975
19780340	The erection of a new golf club house	Approved	05.10.1978
19781061	Re-siting of water tank and erection of single storey building to house pump equipment	Permission	24.06.1980
19790885	Change of use of land buildings clubhouse and car park to a garden centre.	Refused	28.12.1979
19800166	Change of use of land and buildings from use as a golf club house to use as dining rooms for hire with ancillary conference and bar facilities and ancillary office and residential use.	Refused	15.05.1980
19800255	Change of use to a nightclub incorporating a restaurant and dancing facilities.	Refused	27.05.1980
19800522	Change of use of land and buildings to car and lorry park picnic area catering facilities and car repairs.	Refused	12.09.1980
19810374	Application under Regulation 4 of the Town and Country Planning General Regulations 1976 for change of use of the former golf clubhouse to use as a transport cafe licensed restaurant, bar and shop, together with three overnight rooms for lorry drivers and ancillary office stores and toilets; formation of a car park for 30 cars, a lorry/coach park for 29 vehicles, and a picnic area; change of use of the former golf professionals shop and store to use as a dwelling. Change of use of detached	Permission	07.09.1981

	clubroom building to use as a private garage, Outline application for the erection of a garage/workshop building, alterations to existing outbuilding in connection with its use as a store/kiosk building.		
19820280	Erection of single storey building to form clubroom and trolley store.	Permission	28.06.1982
19840749	Detailed plans pursuant to condition (i) of planning permission GR 81 374 relating to the siting design and external appearance of the proposed garage workshop building the proposed external staircase to the former stewards flat and details of all elevation.	Approved	26.11.1984
19930498	Certificate of Appropriate Alternative Development re none hole extension.	Permission	01.12.1993
19940777	Outline application for replacement clubhouse & car park; re-arrangement of existing course & extension for construction of replacement holes & practice ground; & construction of access road from Park Pale (in association with underpass, bridge & access road to Brewers Road, Shorne to be constructed by others).	Permission	26.07.1995
19950574	Details pursuant to outline planning permission ref. no. GR/94/777 [conditions (i) & (iv)] for the erection of a replacement clubhouse relating to the design and appearance of the clubhouse and car park.	Approved	21.12.1995
19950765	Application for the approval of the temporary access road from Park Pale to proposed clubhouse site, as required by condition (vi) of planning permission reference number GR/94/777.	Approved	21.12.1995
19960483	Application for the approval of the revised northern access road from Park Pale to replacement clubhouse pursuant to condition (i) of outline planning permission reference number GR/94/777.	Approved	20.08.1996
19960499	Details of archaeological evaluation pursuant to condition (v) and details of external materials pursuant to condition (xiv) of outline planning permission reference number GR/94/777.	Approved	15.01.1999
19960500	Application for the approval of the landscaping scheme required by condition (x) of planning permission reference number GR/94/777.	Approved	12.12.1996
19960786	Application for the approval of the details of fencing, lighting, waymarking and storage as required by conditions (xi) & (xii) of planning permission reference number GR/94/777.	Approved	30.12.1996
19970139	Application for the approval of the details of external signs and their locations pursuant to condition (xii) of outline planning permission ref. no. GR/94/777.	Approved	11.04.1997

19970473	Variation of condition (xv) of planning permission reference number GR/94/777 to extend the time for demolition of clubhouse to a date three months after the conclusion of the construction of the Wainscott Bypass and change of use of clubhouse to contractors office for a temporary period.	Permission	18.09.1997
19980245	Erection of single storey building for the storage of green keeping equipment.	Permission	15.06.1998
20000583	Erection of a detached building to form a covered tuition area.	Permission	16.10.2000
20040600	Erection of a wooden storage shed.	Permission	24.08.2004
20040759	Erection of single storey implement store, messroom, office, kitchen and w.c. accommodation.	Refused	07.01.2005
20060510	Erection of two single storey detached buildings, one to provide messroom, office and w.c. accommodation and the other to be used as an implement store, both located within the green keeper's yard.	Permission	09.08.2006
20061027	Erection of 14.95m high 'telegraph pole' mobile phone monopole with associated equipment cabinet.	Permission	24.01.2007
20121065	Construction of extension together with alterations to existing first floor balcony on west elevation of clubhouse.	Permission	04.02.2013
20140440	Application for the variation of conditions 2 and 4 attached to planning permission reference number 20121065 for construction of extension together with alterations to existing first floor balcony on west elevation of clubhouse, to allow construction of a trolley store beneath the extended balcony structure.	Permission	30.06.2014
20160129	Extension and alterations to existing first floor balcony attached to west facade of clubhouse.	Permission	06.04.2016
20160130	Erection of new trolley store and locker room (partly- subterranean) beneath existing car park.	Permission	06.04.2016
20180325	Erection of new trolley store and locker room.	Permission	29.06.2018
20211484	<i>This Application</i>		

Pre-Application Submissions

PRE20170601: New trolley store and locker room. Response made 21 December 2017 concluding:

Whilst there is not a fundamental policy objection to this proposal per se nevertheless there is some additional work necessary to demonstrate that the development will not impact on the openness of the Green Belt and there is a need to review the design and scale of the development and impact on the landscape.

Proposal

This application is for a new trolley store and locker room and effectively is a re-application (renewal) of a previous application for the same development that was granted planning permission in 2018, but that permission has now expired.

Submitted Documents and Plans

Planning Application Form and Certificates;

Covering Letters dated 23 November and 09 December 2021 from Lloyd Hunt Associates;
Design and Access Statement, including Appendix A - Ecology Report by Greenlink Ecology Ltd and Appendix B - Drawing No P-3-2333 (part only showing ground level changes);

General Site Location Plan;

1:1250 scale Site Plan;

Drawing No P-1-2333: Existing and Proposed Site Plan;

Drawing No P-2-2333: Site Block Plan;

Drawing No P-3-2333: Elevations;

Drawing No P-4-2333: Plan and Sections;

Drawing No P-5-2333: Existing Car Park;

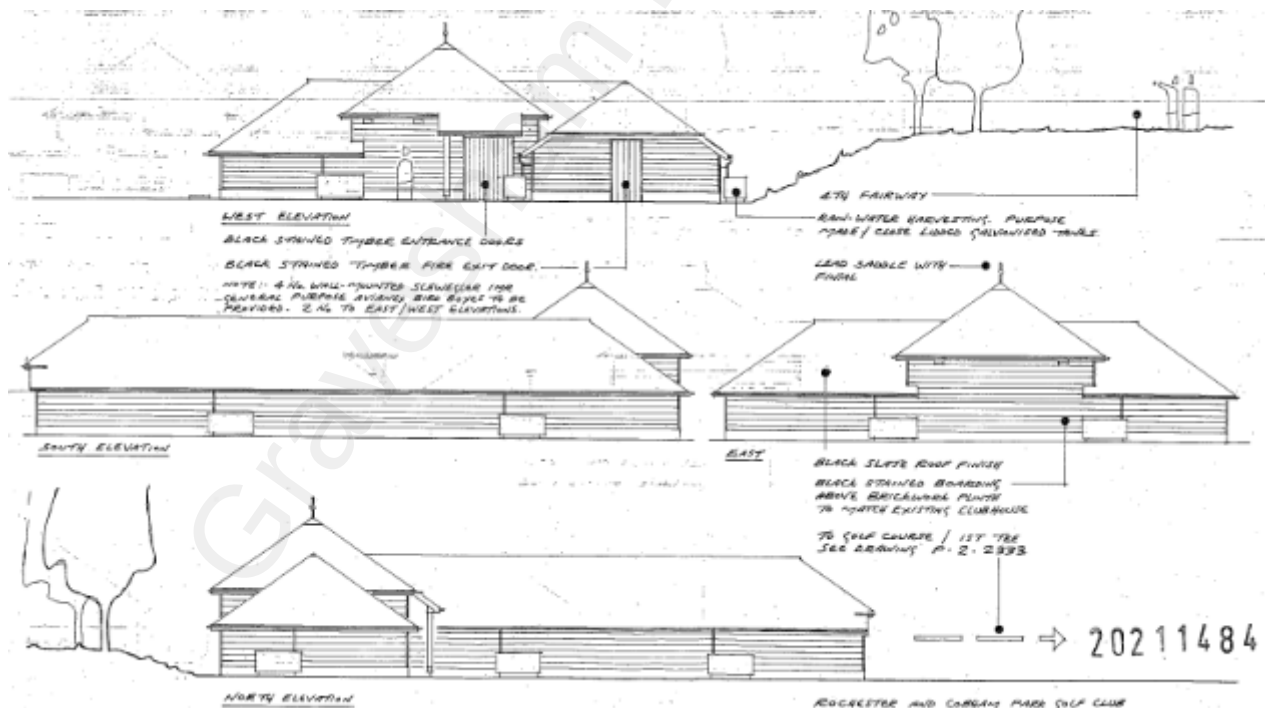
Details of the Development

The proposed building is 20.8m long by 6.0m wide with a projecting wing of (net internal floor area of 174.7m²) space for 112 trolleys and 94 lockers. It will result in the removal/loss of 9 car parking spaces. The existing car park provides 184 car parking spaces plus 3 disability spaces.

The materials for the building are brickwork plinth to match the clubhouse, black stained softwood boarding and a black slate roof. The roof is pitched, with a slightly higher roof to the main entrance.

The scheme includes proposals for rainwater harvesting with a number of purpose made galvanised tanks around the proposed building. The elevations do not include any fenestration

The elevations of the proposed trolley store are as shown below.

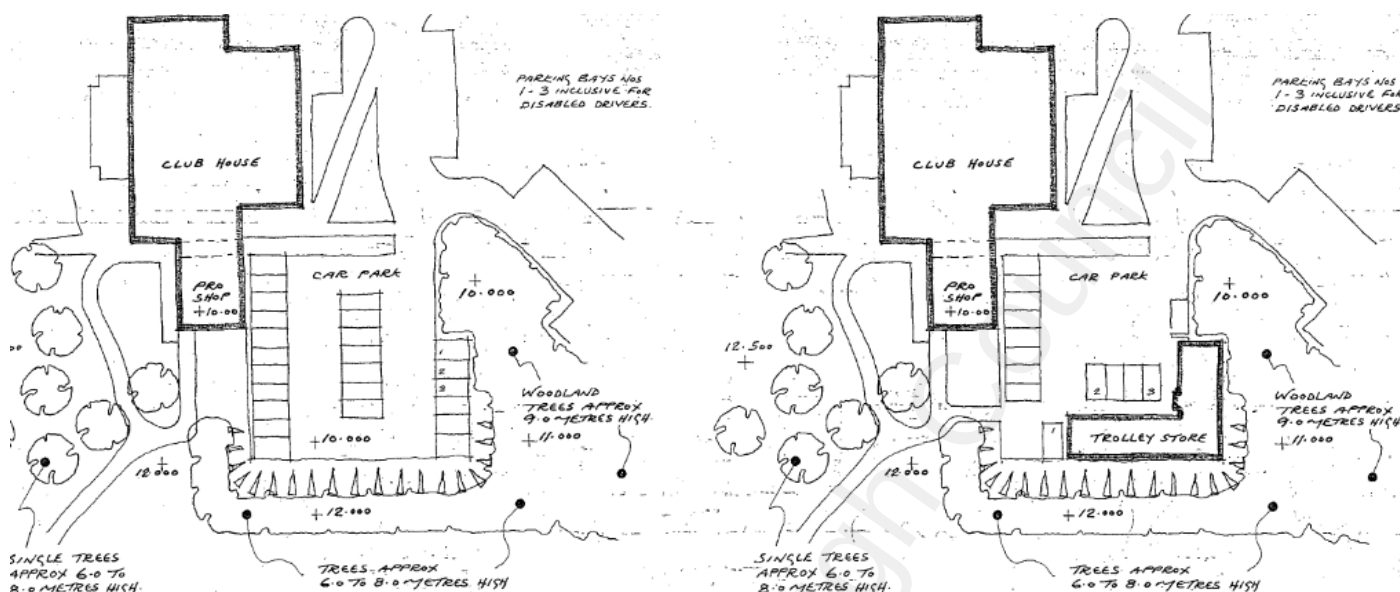


The proposals include a short section of new path linking the building to the pathways on the golf course.

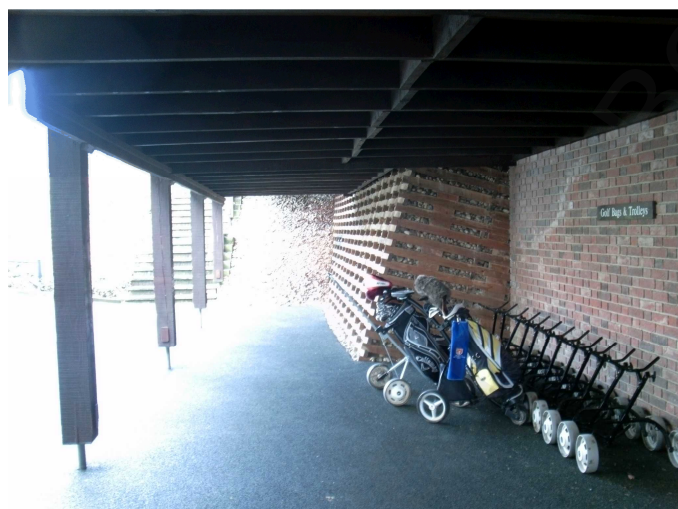
This proposal is as an alternative to a below ground facility (beneath the existing tarmac car park and next to the club pro shop) that was the subject of a planning permission granted in 2016 (20160130) but not implemented. The current surface car park provides car parking spaces principally for named individuals

rather than general club members. At a lower level, the site of the underground facility was adjacent to a walkway between the course/clubhouse and car park and there are structural /retaining walls partly secured by gabions. The subterranean store had a floor area of 176m² and there was space for 120 trolleys and 98 lockers. Apparently this scheme was no longer viable following completion of a fully engineered design solution.

The layout of the development, as now proposed, is shown in the existing and proposed block plans below.



The photographs below (taken in late 2017) show the current arrangements for the storing of trolleys.



The applicants updated Design and Access Statement states:

During the latter part of 2018, the Club obtained costing for the works and was on the verge of appointing a contractor in April 2019 when the Covid pandemic hit the world. Lockdowns occurred and future income for the Club became unpredictable...The Club is now in a position to proceed with the project,

In terms of location, overall footprint and design the drawings now submitted illustrate a building which is absolutely identical to that previously approved and thus the application should not raise any issues which have not already been considered in detail.

Site Location for Proposed Store

Careful consideration has been given to the proposed location for the Trolley Store to achieve two basic objectives. The primary objective is to achieve the best functionality possible in relation to the existing

Clubhouse, whilst the secondary objective is to choose a location which will minimise the buildings impact on Ecology, openness of the Green Belt and the Historic Importance of the Park

Primary Objectives

- (a) Proximity and relationship with the existing changing rooms*
- (b) Proximity and relationship to the Pro-Shop*
- (c) Ease of access to the Golf Course having collected Clubs and/or a Trolley*
- (d) Will it be possible for staff within the Pro-Shop and the management office to have a visual line of sight to the entrance doors of the new store?*
- (e) Will it be easy to extend and/or adapt the existing security surveillance system to provide 24 hour monitoring of the new store?*

It is considered that the proposed location fulfils all of the primary objectives.

Secondary Objectives

- (f) In terms of Ecology will the site selected have any impact upon habitats, protected/notable species and/or designated sites for nature conservation?*
- (g) In terms of "Visual Impact" will the selected site provide the best location to achieve the absolute minimum impact from all aspects of the compass and thereby result in minimum impact upon the "openness of the Green Belt"?*
- (h) Will the site selected allow for the construction of the store so as to have either nil or minimal impact upon the Historic Importance of the Park.*

With regard to Paragraph (f) a Report prepared by Greenlink Ecology Ltd (dated 17th January 2018) has been provided which confirms that the site selected is of Low Ecological Value and suggests that mitigation measures are not considered necessary.

With regard to Paragraph (g) above points (i) to (iv) below are relevant in terms of "Visual Impact".

- (i) The site is not visible on entering the main car park area from an Easterly direction. Existing woodland obscures all views.*
- (ii) Views from the South (4th Tee Box area and its Fairway within the Course) are masked by a line of existing trees. The site will be partially visible during the Winter months but entirely unseen when the trees are in full leaf.*
- (iii) The site is well screened from views from the West due to rising land, existing trees and the existing Pro-shop and Clubhouse buildings.*
- (iv) The site is not visible from the North due to the presence of existing woodland.*

Thus in terms of "Visual Impact" it is considered that the site selected offers the best opportunities for the construction of a building to achieve this objective.

With regard to Paragraph (g) and "Openness of the Green Belt" the most relevant consideration is the Governments Policy Paragraph 79 of the NPPF of which the fundamental aim is to prevent urban sprawl; in addition to the objectives of Paragraph 80 of the NPPF and Local Plan Policy CS02 of the Adopted Gravesham Local Plan Core Strategy.

(Note: The D and A statement has not been updated by the applicants to reflect changes to paragraphs in the NPPF 2021)

The site selected is within a few metres of the existing Clubhouse, which in itself is set at 500 metres from the High Speed Railway Track and A2 Trunk Road, and at a distance of over 600metres from Cobham Hall.

The site is at an approximate distance (as the Crow flies) of one mile from the nearest village (Cobham) and it is considered that the basic tenets of the above Plan Policies are well met in terms of the selected site.

With regard to Paragraph (h) and 'Impact upon the Historic Importance of the Park' the following is considered relevant.

The Golf Course is adjacent to Cobham Hall, which contains Repton's Seat which in itself is of high historic importance. Humphrey Repton's Seat lies close to the right of the 15th Green of the course on land outside

the Clubs ownership. This is where he sat and sketched his design for the Deer Park incorporating a clear long distance view of The Darnley Mausoleum (now more commonly known as the Cobham Mausoleum), designed by James Wyatt for the 4th Earl of Darnley (owners of Cobham Hall). The pyramidal top of this Neo-Classical Monument (completed in 1786) contained within Cobham Woods can be seen from Repton's Seat and the Golf Club (at their expense) continually prune trees close to the 15th Green to ensure that the line of sight from the Seat to the Mausoleum remains as originally intended by Repton. (Cobham Woods abuts the Southern boundary of the Golf Course).

In terms of the impact of buildings and associated hardstandings upon Repton's Deer Park this was considered most carefully before the present Clubhouse was erected in 1997. Indeed the silhouette for the Clubhouse (approximately representing a large Kentish Barn) was considered at length so as not to appear a too incongruous addition to the Deer Park.

The site for the Trolley Store will lie to the South East of the main Clubhouse Pro-Shop massing and as such, it is not visible from Repton's Seat. Accordingly, the concept envisaged for the Deer Park by Humphrey Repton will remain unaffected by the current proposed works, keeping it all as originally intended – other than the amendment required of re-siting the Clubhouse following the Governments Policy to create a High Speed Rail Link with France.

In conclusion it is considered that the site selected (which will not generate a need for additional hardstandings) is the best possible location for the proposed Trolley Store.

The applicant's D and A Statement include a number of other supporting paragraphs that are referred to in the analysis section of this report. It concludes as follows:

Summary and Conclusion

In summary it is our firm opinion that although the erection of most structures within the Green Belt is seen as inappropriate development this application should be positively supported for the following reasons.

- (a) There is no fundamental policy objection to the proposal as it relates to the provision of facilities for outdoor sports.
- (b) The provision of the Trolley Store will assist with financial viability for the Club.
- (c) The proposal is not disproportionate in size in relation to the existing structures.
- (d) The proposal will not give rise to any Highway or Parking issues.
- (e) The proposed building is well designed, appropriate for its intended use and relates well to the established development.
- (f) The proposed building does not impact upon the Ecology of the Natural Environment. The provision of some Bird Boxes will actually assist with the Ecology of the area.
- (g) The proposal will not have an adverse impact upon the Historical Environment of the Golf Course.
- (h) External views from Cobham Woods into the Golf Course will be enhanced.
- (i) The proposal will have NIL negative impact upon climate change under the Water Framework Directive Objectives. The collection of rainwater from the roof of the proposed Store can be seen as a minor improvement in Water Efficiency.
- (j) The Trolley Store and Locker Room is a much needed element for the members of the Golf Club.

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Courts have held that it is a matter of planning judgement as to whether a proposal is in accordance with the development plan when 'read as a whole' and conflict with a particular policy or policies may not pass that threshold.¹

Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

¹ See the Judgement in the Court of Appeal on R(on the application of William Corbett) and The Cornwall Council and others [2020] EWCA Civ 508 at <https://www.bailii.org/ew/cases/EWCA/Civ/2020/508.pdf>

The Development Plan for Gravesham currently comprises:

- *The Gravesham Local Plan Core Strategy and Policies Map (September 2014);*
- *Remaining Saved Policies in the Gravesham Local Plan First Review (November 1994); and*
- *The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020)*

There are a number of other planning policy documents which are of some relevance to the consideration of planning applications and are material considerations, including national planning advice and guidance in the National Planning Policy Framework (NPPF), the National Planning Practice Guidance (NPPG), and supplementary planning guidance and where they exist neighbourhood plans. There are currently no relevant neighbourhood plans.

Previous decisions on planning applications and appeals relating to the site and relevant case law etc. are also capable of being material considerations.

Local Planning Guidance

Gravesham Local Plan Core Strategy, September 2014

The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main areas where major change is likely to take place and allocates sites which are key to achieving the strategy.

The application site lies within the **Green Belt** (Policy CS02), and an **Area of Outstanding Natural Beauty** (AoNB) (Policy CS12) as defined on the Gravesham Local Plan Core Strategy Policies Map.

The site lies close to the Cobham Woods **Site of Special Scientific Interest** (SSSI), (Policy CS12) and a **Scheduled Ancient Monument** (Policy CS20)

The following development plan policies in the Gravesham Local Plan Core Strategy are of relevance to the consideration of this planning application:

Core Strategy Policy CS01: Sustainable Development
Core Strategy Policy CS02: Scale and Distribution of Development
Core Strategy Policy CS11: Transport
Core Strategy Policy CS12: Green Infrastructure
Core Strategy Policy CS13: Green Space, Sport and Recreation
Core Strategy Policy CS18: Climate Change
Core Strategy Policy CS19: Development and Design Principles
Core Strategy Policy CS20: Heritage and the Historic Environment

Policy CS01 (Sustainable Development) sets out that support will be given to proposals that accord with the development plan. A positive approach to new development will be taken that reflects the presumption in favour of sustainable development set out in the NPPF and the Local Plan Core Strategy.

Policy CS02 (Scale and Distribution of Development) sets out the Council's development strategy which prioritises focussing new development in the urban area and rural settlements inset from the Green Belt.

Paragraph 4.2.27 indicates that the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map.

Policy CS11 (Transport) sets out that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking in new development will be provided in accordance with adopted parking standards reflecting the availability of alternative means of transport and accessibility to services and facilities.

Policy CS12 (Green Infrastructure) indicates that all green spaces contribute to the green infrastructure network and that the multifunctional network of green spaces will be created, protected, enhanced and maintained. It requires that there should be no net loss of biodiversity in the Borough and gives protection amongst other things to internationally designated sites. It sets out that the overall landscape character and valued landscapes within the borough will be conserved and enhanced.

Policy CS13 (Green Space, Sport and Recreation) indicates that adequate permission to protect and enhance the quantity, quality and accessibility of green space playing pitches and other sports facilities will be made in accordance with up to date evidence.

Policy CS18 (Climate Change) seeks to ensure that Water Framework Directive objectives are secured and that the impact of development on waste water drainage systems is minimised. Surface water run-off from all new development should, as a minimum, have no greater adverse impact than the existing use. It requires the use of Sustainable Drainage Systems where technically and financially feasible. It requires the water efficiency measures to be installed to achieve the equivalent of level 3/4 of the Code for Sustainable Homes (105 litres per person per day)² Details of how you propose to address these issues should accompany your planning application.

Policy CS19 (Development and Design Principles) seeks to ensure that new development is 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. In order to achieve this a robust analysis of the local context and character which take account of views, site topography, the significance of features of landscape value which contribute to local character and sense of place, should accompany your planning application.

New development should, amongst other things:

- be sustainably located and well connected to local services and facilities
- avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution and land contamination.
- Protect and enhance biodiversity opportunities

Policy CS20 (Heritage and the Historic Environment) sets out that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk.

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Gravesham Local Plan First Review 1994

The Gravesham Local Plan First Review was originally adopted in November 1994.

A substantial number of policies of the Gravesham Local Plan First Review were saved by a Direction dated 25 September 2007 of the Secretary of State under paragraph 1 (3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 as transitional arrangements pending adoption of the Core Strategy.

Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework (NPPF, paragraph 219).

Those Local Plan First Review policies that remain in force are listed in Appendix 1 of the Local Plan Core Strategy. The remaining saved policies will be replaced following the adoption of the Site Allocations and Development Management Policies Development Plan Document.

² Now equivalent to 110 litres per person per day as required by National Standard – see GBC Housing Standards Policy Statement (2015) at http://www.gravesham.gov.uk/_data/assets/pdf_file/0016/201625/Housing-Standards-Policy-Statement.pdf

The following remaining saved policies are relevant to the consideration of this proposal:

Policy T1: Impact of Development on the Highway Network

Policy T2: Channel traffic to the Primary and District Distributor Network

Policy T3: Development not well related to the Primary and District Distributor Network

Policy T4: Development outside the Built-Up Area

Policy T5: New Accesses onto Highway Network

Policy P3: Vehicle Parking Standards

Saved Policy T1 requires that all proposed developments are adequately served by the highway network identified on the Proposals Map.

Saved Policy T4 indicates that proposal that generate significant vehicular or pedestrian traffic outside of built up areas will not be permitted.

Saved Policy T5 requires that the formation of new accesses or the intensification of use of existing accesses to the roads forming the highway network shown on the Proposals Map, will not normally be permitted, except where no danger would arise and where a properly formed access can be created in a location and to a standard acceptable to the Local Planning and Highway Authorities.

Saved Policy P3 (Policy for Vehicle Parking Standards) indicates that development will be expected to make provision for vehicle parking in accordance with the KCC Vehicle Parking Standards.

Review of Local Plan

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 is in need of a partial review in terms of Policy CS02 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) general conform with the National Planning Policy Framework (2021), the Council will also seek to replace these.

Gravesham Local Plan Regulation 18 Stage 2 Consultation Part 2: Draft Development Management Policies Document October 2020

The Council published in 2020 a Regulation 18 (stage 2) consultation on its proposed Development Management Policies Document, replacing the 2018 Stage 1 version, which will in due course form part of and update the Gravesham Local Plan. Under paragraph 48 of the NPPF, policies in this document may be accorded weight in the decision making process with this varying according to its stage of preparation; the extent to which there are unresolved objections; and the degree of consistency of policy with those in the Framework. As the Development Management Policies Document is at an early stage and the fact that the consultation has only recently concluded, the policies therein should at this stage be given very limited weight. It should be noted, in any event, that many of the relevant policies reflect those set out in the Framework and for the purposes of this application these should be relied on instead.

The following draft policies from the Regulation 18 (Stage 2) Development Management Policies Document (2020) show the direction of travel the Council is going albeit the weight that these emerging policies may be accorded at this stage is very limited.

Proposed Policy GB 3: New Buildings and other Facilities for Outdoor Sport, Recreation and Cemeteries in the Green Belt;

Proposed Policy INF 2: Transport Design Principles;

Proposed Policy INF 3: Understanding and Mitigating Transport Impacts;

Proposed Policy INF 4: New Accesses and Junctions;

Proposed Policy INF 5: Electric Vehicle Charging Points;

Proposed Policy GI 1: Open Space, Playing Pitches and Sports Facilities Retention;

Proposed Policy GI 4: Trees, Hedgerows and Woodland;

Proposed Policy GI 5: Landscape Character;
Proposed Policy GI 6: Biodiversity;
Proposed Policy HER 4: Archaeology;

Proposed Policy GB3: New Buildings and other Facilities for Outdoor Sport, Recreation and Cemeteries in the Green Belt states:

3.4.4. Proposals for new buildings and other facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments in the Green Belt will only be permitted where they:

- are appropriate, directly related to and reasonably required to support the lawful use of the site for the above purposes;
- preserve the openness of the Green Belt and do not conflict with the purposes of including land within it by reason of their scale, height, bulk, size, design, location and visual impact;
- prioritise the re-use of existing buildings over the development of new buildings where practical; and
- satisfactorily integrate with existing buildings, where present.

3.4.5. In determining applications under this policy, the Council will also have regard to the highway and amenity impacts of any proposals, including but not limited to the access and the approach road and the need for additional car parking.

3.4.6. Consideration will also be given to potential adverse visual impacts due to the introduction of increased activity and lighting on the Green Belt, along with impacts on landscape and character of the countryside as additional factors. Potential harm to biodiversity, including through the introduction of artificial lighting, may also be a material consideration in some cases, requiring the submission of evidence.

National Planning Policy Guidance

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) July 2021 is a material consideration.

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which means approving development proposals that accord with the development plan without delay and where there are no relevant development plan policies or where the policies are out of date planning permission should be granted unless policies of the Framework provide a clear reason for refusing the development such as where land is designated as Green Belt or any adverse impacts would so significantly and demonstrably outweigh the benefits or specific policies in the NPPF taken as a whole.

The NPPF includes (in paragraph 8) three overarching objectives to achieving sustainable development:

- an economic objective;
- a social objective; and
- an environmental objective.

The following paragraphs are specifically highlighted as being of importance to the consideration of the application proposals, but it should not be taken that these are the only parts of the NPPF that need to be considered. Reference to the national planning guidance is also considered in the analysis section of this report.

Section 2, Paragraphs 7 - 14: Achieving Sustainable Development

Section 4, Paragraphs 38 - 59: Decision Making

Section 8, Paragraphs 92 - 103: Promoting Healthy and Safe Communities

Section 9, Paragraphs 104 - 113: Promoting Sustainable Transport

Section 12, Paragraphs 126 - 136: Achieving well-designed places

Section 13, Paragraphs 137 - 151: Protecting Green Belt Land

Section 14, Paragraphs 152 - 173: Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 15, Paragraphs 174 - 188: Conserving and Enhancing the Natural Environment

Section 16, Paragraphs 189 - 208: Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance and other Documents

The Council has adopted a number of Supplementary Planning Guidance documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

The following documents are relevant to the consideration of this application:

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006)
- Vehicle Accesses on Classified Highways (SPG6 November 1992)
- Gravesham Landscape Character Assessment, May 2009 (a technical document which underpins Local Plan Core Strategy Policy CS12).

The application site lies within the Ashenbank and Cobham Parklands landscape character area in the Gravesham Landscape Character Assessment where the key characteristics are:

- Slightly undulating topography with a strong presence of man-made landform
- Historic Elizabethan manor set within Repton parkland landscape
- Golf course located within parkland landscape
- Large parkland trees
- Two large areas of dense ancient woodland
- Traditional village centre, typical of North Kent landscape
- Native hedgerows, three bar wrought iron and timber fencing

The overall condition of the landscape can be assessed as being very good as visually the landscape is strongly unified and the area has a very strong functional integrity. The divide between parkland, golf course and farmland is visually evident, and the areas of open parkland and golf course are largely uninterrupted. The woodland and large parkland trees that are scattered through the landscape provide coherency.

Although the area has a historic and distinct sense of character, the low level of visibility within the area would limit the impact of change to the landscape. It can be concluded that the sensitivity of the character area is moderate.

The guidelines are to conserve and reinforce through:

- Conservation of parkland trees and woodland cover
- Reinforcing the character of the area by planting native species replace older trees and creating and maintaining wood pastures
- Managing access arrangements to balance the need for recreation while controlling unauthorised access and anti-social uses and respecting ecological sensitivity

Kent Downs AONB Management Plan 2021-2026

The application site lies within the Kent Downs AONB. As such the principles in the now adopted Kent Downs AONB Management Plan are relevant. The link to the document is as follows:

<https://kentdowns.org.uk/management-plan-2021-2026/>

Consultations, Publicity and Representations

Internal Consultations

GBC Conservation Architect

No comments received

GBC Highway Development Management Officer

Given that an identical proposal was approved in 2018 and nothing has changed in terms of highway guidance since then, I have no objections. However, any further delay in its construction may require a review of the car parking requirements as more than three years will have passed since the last review.

Ward Councillors

No comments received

External Consultations

KCC Heritage and Conservation

The site lies within an area of multi-period archaeological potential within Cobham Park. I consider it unlikely, however, that this proposal will have a significant below-ground archaeological impact due to the existing cut for the car park. I have no further comments to make in this case.

Cobham Parish Council

No comments received

The Gardens Trust

Thank you for consulting the Gardens Trust in its role as Statutory Consultee on the above application which affects Cobham Hall, an historic designed landscape of national importance which is included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II*. We have considered the information provided in support of the application and liaised with our colleagues in Kent Gardens Trust. On the basis of this we confirm we do not wish to comment on the proposals at this stage. We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

Historic England

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals.

Kent Downs AONB Management Unit

No comments received

Publicity

The application has been advertised by a site notice under Article 15. There is no specific adjoining land or properties that would be affected by the development or its siting that required direct neighbour notification.

Expiry date for site notice: 14 January 2022

No representations have been received

Planning Analysis and Appraisal

Introduction/Background

This application is effectively a re-application (renewal) of a previous application (ref 20180325) for the same development that was granted planning permission in 2018, but now expired.

The 2018 planning application was fully considered and assessed and deemed to be acceptable against the policy background notably being within a Green Belt area and an Area of Outstanding Natural Beauty, appropriate in design terms and in respect of its impact on the character of the landscape, in terms of potential impact on the highway and in respect of the marginal loss of parking and in respect of all other material planning considerations including biodiversity, archaeology and any historic impacts. At that time, there were no adverse consultee or public responses to the development.

The current proposal makes no changes at all to the design, size, siting or appearance of the proposed trolley store.

There have been no adverse responses to the consultations and publicity given to this further application.

There have been no significant or material changes to local or national planning policy relative to the proposed development since the 2018 decision to grant planning permission, other than the publication of a revised NPPF in respect of national planning advice and which has not resulted in any material changes to the thrust or policy direction relating to Green Belt policy only with changes to paragraphs or minor rewording.

Therefore, it is not intended to completely re-assess the proposals within this report but to set out an updated analysis based on the 2018 assessment.

The Key Issues

The main issues, as previously, to consider in this proposal are whether:

- The development is appropriate development within the Green Belt;
- The appropriateness of the scale and design of the development;
- The impact of the development on the landscape and the historic landscape setting.
- The impact on the loss of car parking
- Any other material planning considerations - archaeology/ecology

Green Belt

Paragraph 149 of the NPPF 2021 advises that the construction of new buildings is inappropriate in the Green Belt but lists the exceptions to this which include, amongst other things, 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 and also the provision of appropriate facilities for outdoor sport and outdoor recreation as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

It is considered that the development would fall within the exceptions under paragraph 149 as being appropriate facilities for outdoor sport and outdoor recreation and are ancillary to the general clubhouse facilities that support the golf club and course. The test is therefore whether the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

In the subterranean scheme the proposed works were within the confines of the existing built form of the Clubhouse and not on its periphery, and there was no encroachment into the countryside and thus no conflict with Paragraph 138 of the NPPF. The built form was already to a large extent in existence as the store would be underground and the retaining walls already built. There was therefore no outward appearance or effectively no actual enlargement of the building on the ground. The built form did not

increase in height, with the development reinstating the existing level of the tarmac car park above. There was also no increase in hard standing on the site.

In the above ground facility there is no additional hardstanding other than a small connecting pathway but the development needs to be assessed in terms of its impact on openness and this does not simply mean that it is acceptable in Green Belt terms to replace an existing hard surfaced area with building.

There is no specific definition of "openness" in the national planning guidance in the NPPF, and the concept of what is considered as openness has only really emerged from case law (such as the case of *Timmins and Anor v Gedling Borough Council* [2014]). Effectively, 'openness' is epitomised by the absence of built development (i.e. land that is not built on) and it follows therefore that any new built development is likely to have an adverse impact on the openness of the Green Belt, but whether that impact is greater or lesser on sites where there is already built development will be dependent on an assessment on a case by case basis. It is a different concept to "visual impact". Although openness may be considered in a visual sense, the visual impact of a development in the Green Belt may be harmful through the siting, design and materials used. The presence of landscaping or screening may serve to mitigate the visual impact of a development including built development but there might still be an impact on openness.

Therefore on the basis of the above the development would have some impact on the openness simply because there is not a specific above ground built form on the site other than existing tarmac hardstanding.

It does not appear that any existing built form elsewhere is being lost effectively to compensate for the proposed development and there has been a limited analysis presented as to why this site has been selected and whether other alternative above ground sites might also be considered or have been considered.

However, in the 2018 application the GBC planning policy manager did not raise an objection to the proposal on Green Belt grounds on the grounds of inappropriateness commenting that:

In this instance, the new building would serve to screen part of the car parking area; is well designed in terms of context and would be read in conjunction with the existing clubhouse as part of an integrated complex. It is arguable therefore that the building would not have an adverse impact on the wider openness of the Green Belt at this point and would not conflict with its purposes.

On balance, it is not considered that the development is contrary to local plan policy CS02 or section 13 of the NPPF (Green Belts) and can therefore be supported in principle.

Scale and Design

The building is of an appropriate design with suitable materials reflecting the design and materials of the other golf club buildings on the site.

It is reasonably low pitched and is partly screened from the south and east by the tree screening.

In plan form however the building has a large footprint.

At the pre-application stage in 2017 the design then was very elongated being over 30m long with a rectangular shape and this had been amended in the 2018 submission stage as a result of design comments in the pre-application response, to an L shaped built form with a long section of 20m and projecting wing of some 10m.

The roof of the building had been amended as well. The pre-application submission included a central flat roofed section. In the 2018 application scheme the roof had generally been lowered by having a shallower pitch and thus eliminating the need for a flat roofed section. In the pre-application stage the design showed a 45° roof pitch and the use of plain tiles. In the 2018 scheme it was shown as a black slate roof.

The GBC Conservation Architect responding to the 2018 consultation suggested that this should be natural blue grey slate and it would therefore be necessary to seek approval of materials as a planning condition if the development is considered acceptable in all other terms.

Overall the design of the development is considered as being acceptable in policy terms and not contrary to either adopted core strategy policies notably CS19 or the NPPF design policies.

Impact on the Landscape

The Gravesham Landscape Character Assessment (2009) identifies the application site as lying within the Ashenbank and Cobham Parklands landscape character area.



In terms of the visual impact of the development whilst some detailed visual analysis would have been helpful showing any long distance views of the proposed building and identifying whether any screening could assist in reducing the visual impact of the development it is noted that the proposed siting of the building is within a slightly sunken and lower part of the site and is already well screened by trees.

Neither Historic England, nor the Gardens Trust object to the development.

On balance it is not considered that the building would have a harmful impact on the wider landscape and is not contrary to adopted local and national landscape policies.

Highways and Parking

It is not considered that the development would have a material impact on highway safety but there is a slight loss of parking overall due to the displacement of some existing surfaced parking on the site.

The applicants revised Design and Access Statement addresses this issue commenting:

Currently, there is a total provision of 187 spaces (2.5m x 5.0m) adjacent to the clubhouse with spaces nos. 1 to 3 inclusive, for the exclusive use of disabled drivers. Of the 187 spaces, 12 no are allocated for staff working within the office, pro-shop, bar and kitchen/catering areas leaving 172 spaces for playing members. Please note that the ground staff park within the machine maintenance yard, which is located in another part of the course. Following completion of the proposed Trolley Store, the number of parking spaces for paying members will reduce from 172 to 163.*

In assessing the adequacy of the car park to accommodate players various scenarios have been considered, ranging from standard mid-week play through to weekend play to special pro-am and special Sunday Lunch events. Note: All figures given are from the Pro-Shop which monitors the number of players as they tee-off.

Generally speaking golfers fall into two distinct categories, either early morning players or early afternoon. Thus although on any mid-week day a total of 110 to 150 maximum people might play, they are not all present at the same time. 60 to 80 players in the morning with 50 to 70 in the afternoon. Players who commenced at 8.00am will be gone by 1.00 to 1.30; well before those wishing to play at 2.00 or 2.30.

But let us assume that all of the morning players do not leave until all of the afternoon players have arrived giving a total of 150 cars within a total capacity of 163.

Saturdays Club Competitions can attract as many as 156 entrants – although the normal number is 120 to 144. Since all players have to have an exact tee-off time there would be very little point in someone teeing off at 2.30pm arriving at the course much earlier than 1.45pm by which time those who teed off at 7.30am will probably have left the Club between 12.30 and 1.00pm. However, assuming every player is present all day and the entry number is 156 this would still leave 7 unoccupied spaces.

Pro-Am Special Event occur only once a year and the course is closed to all members other than those taking part in the event. Thus the number of people attending is clearly defined.

The worst case scenario for these type of events would be a 'shot-gun start' where all Tee-Boxes are occupied by 2 teams of 4 with all players teeing off at the same time. Total number of players would be 144. With an allowance of 6 spaces for additional staff to help on the day a total of 150 spaces leaving 13 car parking spaces unoccupied.

Special Sunday Lunches have been known to attract as many as 120 people but this would be a rare event. Generally they are a husband and wife/partner affair including some children. Many attendees bring friends (drink/driving) resulting in a car occupancy rate well in excess of 2. However, utilising a figure of 2 there would be a need for 60 parking spaces to service those partaking of lunch. Sundays tend to be quiet days for golf with the course virtually empty on Sunday afternoons. However, if we assume the normal mid-week maximum of 80 morning players it is possible that the total number of parking spaces required for both players and diners could reach 140 leaving 23 spaces unoccupied.

As a final point please note that within the curtilage of the Golf Course there is a half mile access road leading from the entrance gates to the existing car park plus a flat practise area (150metres x 40metres i.e. 600m²). It is estimated that 60 cars could be parked directly off of the access road with a further 300 on the practice area if ever an occasion arose where such large numbers of vehicles were required to be accommodated. Thus with the potential to provide a further 360 car parking spaces within the course grounds (a number greatly in excess of the nine spaces to be lost as a result of the proposed development.

The GBC Highways Development Management Officer has raised no objection but suggests any further delay in its construction may require a review of the car parking requirements as more than three years will have passed since the last review

It is accepted that there is capacity within the golf course grounds to accommodate a significant increase in parking but it is not considered necessary to seek additional parking provision as a condition of permission for this development.

There are therefore no reasons to object to the scheme in highways or parking terms.

Other Material Issues

Heritage and Archaeology

In the applicants planning statement the applicant's agent's states:

The site for the trolley store will lie to the south east of the main clubhouse pro-shop massing and as such it is not visible from Repton's Seat. Accordingly, the concept envisaged for the Deer Park by Humphrey Repton will remain unaffected by the current proposed works.

KCC Heritage and Conservation advise that it is unlikely that this proposal will have a significant below-ground archaeological impact due to the existing cut for the car park.

Ecology

The ecology report indicates that the site of the proposed trolley store is of low ecological value.

The design of the scheme includes the incorporation of 4 wall mounted bird boxes. There is no loss or

impact on existing flora and fauna.

Sustainability

The proposal include the installation of 8 galvanised storage tanks for rainwater harvesting.

Human Rights Act

This application has to be considered in relation to the provisions of the Human Rights Act, in particular Article 8 (privacy/family life) and Article 1 of the First Protocol (protection of property). Having regard to the principles of proportionality, it has been concluded that there are no issues arising from the proposal, which appear to override the responsibility of the Borough Council to regulate land use for the benefit of the community as a whole, in accordance with national law.

Conclusions and Balancing Exercise

An identical development at the site of the same design and siting was considered acceptable in 2018 and granted permission subject to planning conditions. There have been no material changes to planning policy at a national or local level since then.

On balance therefore there are no overriding planning objections to the development, it is not contrary to adopted Local Plan Core Strategy policies CS02, CS11, CS12, CS19 and CS20 or the national planning principles in the NPPF and NPPG and it is recommended that planning permission be granted to the scheme subject to conditions, reasons and informatives.

Recommendation:

PLANNING PERMISSION be **GRANTED** subject to planning conditions, reasons and informatives

CONDITIONS AND REASONS:

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.

2. The development hereby permitted shall be carried out only in precise accordance with the following approved details, plans and specifications:

Planning Application Form and Certificates;
Covering Letters dated 23 November and 09 December 2021 from Lloyd Hunt Associates;
Design and Access Statement, including Appendix A - Ecology Report by Greenlink Ecology Ltd and Appendix B - Drawing No P-3-2333 (part only showing ground level changes);
General Site Location Plan;
1:1250 scale Site Plan;
Drawing No P-1-2333: Existing and Proposed Site Plan;
Drawing No P-2-2333: Site Block Plan;
Drawing No P-3-2333: Elevations;
Drawing No P-4-2333: Plan and Sections;
Drawing No P-5-2333: Existing Car Park;

and those approved pursuant to any planning conditions contained herein after and there shall be no deviation therefrom.

Reason: In order to ensure the development is implemented on the basis of the scheme as submitted and assessed in the interests of proper planning and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

3. The building as hereby permitted shall be used only for a trolley store and locker room ancillary to the use of the site as a golf club and for no other purpose.

Reason: In order that any other uses of the structure may be the subject of a separate planning application which the Local Planning Authority would wish to consider on its merits having regard to the prevailing planning policies in the NPPF and the adopted development plan as the site is within a Green Belt area and an open and historic landscape setting.

4. Notwithstanding the details shown in the approved drawings, details and samples of the external facing materials to be used in the construction of the building hereby permitted shall be submitted to and approved in writing by the Local Planning Authority before the commencement of any above ground works; the development shall be carried out in complete accordance with the approved details before the building hereby permitted is first occupied.

Reason: In the interests of visual amenity and the open landscape character of the area and pursuant to Gravesham Local Plan Core Strategy Policies CS19: Development and Design Principles and CS20: Heritage and the Historic Environment.

INFORMATIVES

1 DEVIATION FROM THE APPROVED PLANS

Deviation from or amendment to the approved plans could require a further application and permission/consent. In the event that any change is proposed, applicants and builders are advised to seek advice from the Local Planning Authority. Proceeding without the necessary permissions or consents could result in enforcement action.

2 BUILDING REGULATIONS AND PARTY WALL ACT 1996

This decision **DOES NOT** imply any consent which may be required under the Building Regulations or under any enactment or provision other than Section 57 of the Town and Country Planning Act 1990. Nor does it override any private rights which any person may have relating to the land affected by this decision, including the provisions of the Party Wall etc. Act 1996. This legislation is not taken into account when determining a planning application and independent advice should be taken in this regard.

3 STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION TAKING

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and paragraph 38 of the National Planning Policy Framework (NPPF) 2021, the Local Planning Authority has approached the assessment and determination of this application in a positive and proactive manner and, where appropriate, has worked with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area, and that is in accordance with the Development Plan for the area.

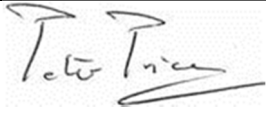
In this instance the application was acceptable as submitted.

4 WORKS OF CONSTRUCTION

Hours of work of construction site plant, equipment and machinery, should be restricted to not earlier than 7.00 a.m. and not later than 6.00 p.m. weekdays and Saturday working should be restricted to not earlier

than 8.00a.m. and not later than 1.00 p.m. No work shall be carried out on Sundays, Bank or Public Holidays.

- i. Suitable sound attenuation shall be used at all times in respect of all plant, machinery and equipment in operation on site in order to aid prevention of noise nuisance. Compliance with BS 5228: Part 1: 1984 and subsequent amendments regarding the use of equipment on site will be required in appropriate cases.
- ii. A suitable method of control shall be used in order to aid prevention of dust nuisance arising from work activities on site.
- iii. Burning of waste materials shall not be carried out on site. Such materials are to be stored in a suitable receptacle, as far from residential accommodation as reasonably practicable, pending disposal off site.
- iv. Adequate arrangements shall be made to remove all waste material from the site on a regular basis and to dispose of it at a suitably licensed waste disposal site.

Case Officer:	Mr Peter Price	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	24 th January 2022	Dated:	25 th January 2022

File Location: H: Plan/Typing/General/Peter/Delegated Reports/Uniform - 20211484 - Delegated Report - Rochester and Cobham Park Golf Club Park Pale - new trolley store and locker room