



Planning and Design and Access Statement

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

July 2022

Rosewood House, High Street, Hadlow, Tonbridge, Kent TN11 0EF t: 01732 850995 e: ma@mka-planning.co.uk w: mka-architects.co.uk

MKA Architects Ltd. reg. in England:
No: 5869675; Reg. office: 3 Boyne
Park, T. Wells, Kent TN4 8EN



Prepared for

Mid Kent Golf Club

Prepared by

MKA Planning
Rosewood House
High Street
Hadlow
Tonbridge
Kent TN11 0EF

Contact

Tel: 01732 850995
w: mka-architects.co.uk

Our Reference: 2353

1.0 BACKGROUND

- 1.1 The Mid Kent Golf Club is an 18-hole golf course established in 1909 and located on sloping land between Wrotham Road to the west and Singlewell Road to the east with the clubhouse located off Singlewell Road and to the rear of dwellings in Dennis Road.
- 1.2 The golf course is bounded to the south by the rear gardens of two storey houses in Chalky Bank and runs alongside Harman Avenue. It extends to an area of some 88 acres (35.6 hectares) and is a parkland type course with a length of approx. 6,106 yards (par 70).
- 1.3 The current and now extended clubhouse (which dates from the early/mid1960's) and the car park are located in the north east corner of the site with access from Singlewell Road.
- 1.4 The clubhouse and car park lie to the south of an attractive terrace of 1930's two storey dwellings on the west side of Singlewell Road (no's 175-183).
- 1.5 Historically there was a golf clubhouse on what is now 166-170 Singlewell Road on the corner of Ascot Road. The green keeper's area and buildings are in the south west corner of the course accessed from Wrotham Road.
- 1.6 The access to Wrotham Road is gated and has restricted visibility. This is immediately north of a terrace of two storey cottages (350-356 Wrotham Road), which date from the late 1890's, and are apparently within the club's ownership.
- 1.7 There is an irrigation lake towards the southern end of the course. The course is enclosed by 2m high palisade fencing and hedging.
- 1.8 The golf course has a practice putting green and a practice driving range for club members near the clubhouse. Membership of the club is circa 850 members.

- 1.9 The car parking includes a small car parking area for club pro, chairman directors and staff just to the north of the clubhouse with space for at least 10 cars with some disabled parking spaces and a larger car parking area for members and guests to the west of the clubhouse providing parking for approx. 140 cars (of which some 5-6 are allocated as staff spaces).
- 1.10 The car park lies to the south of the foot of the rear gardens of existing two storey 1940's semi-detached and terraced dwellings in Dennis Road.
- 1.11 The single storey clubhouse is constructed of brickwork with a part tiled roof and part flat roofed and has been extended over the years. Historically there was an air raid warden's post of uncertain design on the entrance area to the Mid-Kent Golf Course in Singlewell Road, Gravesend. It was built around 1939, decommissioned in 1945 and demolished around 1970. There were wartime allotments within the course.

2.0 RELEVANT RECENT PLANNING HISTORY

- 2.1 The site benefits from a long planning history. The following is an extract of the most recent relevant applications:

20040455 Erection of a 2 metre high perimeter fence around the Wrotham Road, Singlewell Road and Harman Avenue/Chalky Bank boundaries. Granted

20040751 Re-siting of first green teeing area and erection of a 2 metre high fence around the new area. Granted

20080740 Erection of single storey extension to provide reception, office, staff room, kitchen, function/dining room, bar area and glazed entrance canopy with a trolley locker store at lower ground floor level; erection of new entrance gates and front wall along Singlewell Road frontage and provision of new car parking layout and refuse storage area. Granted

20110785 Application for renewal of planning permission 20080740 for erection of single storey extension to provide reception, office, staff room, kitchen, function/dining room, bar area and glazed entrance canopy with a trolley locker store at lower ground floor level; erection of new entrance gates and front wall along Singlewell Road frontage, provision of new car parking layout and refuse storage area. Granted

20130229 Erection of single storey rear extension to provide large bar/dining area; raised roof to north west corner to provide additional kitchen accommodation; new front entrance canopy; low level boundary wall and gate and revised parking layout. Granted

20130621 Construction of an irrigation reservoir. Granted

20131103 Enlargement of existing concrete yard to include a wash down bay for machinery. Granted

20160599 Extension to and improvements to the existing storage area. Granted

3.0 PROPOSAL

3.1 This submission is for the refurbishment and extension of the clubhouse.

3.2 The club house has now reached a point where it needs general refurbishment, updating and re-consideration as the needs of the club have changed since the building was last reviewed.

3.3 The Club has always been keen to reach out to its local community and provides a location for various functions etc. In addition, due to the age and condition of the roofs on the Western half of the building the Club is looking at ways to re-consider the use of the more public spaces.

3.4 The current layout of the bar space, lounge(s) and kitchen is dated and the Club is looking to provide better public spaces for the hire/ use and to also give better views from the

lounge to the course on the South side. The design scheme therefore proposes to re-organise the interior of the Western side of the club house in the following ways:-

- Move the kitchen to the replace the Robbie Bar on the Eastern side
- Re-design the central bar to better access the various spaces

3.5 In addition the scheme proposes to add a two storey piece to the Western side of the building to provide:-

- Additional function/ bar/ lounge spaces
- A first floor viewing room and open gallery to the south elevation looking south across the course

3.6 The ground floor extension will be 6m wide from the existing Western Elevation, it will be the full depth of the existing building and extend to the south by approx. 2.8 m which is around 750mm longer than the existing canopy roof over the southern terrace.

3.7 The extension will also add a new entrance way to the function rooms to provide for an event that needs to run simultaneously or independently to the golf club. This will allow parts of the building to be used without the whole building having to remain open.

3.8 The two storey element will be limited to the Southern end of the extension, it will be approx. 14m long leaving the northern 11m to be single storey to match the existing building.

3.9 The two storey element will sit approx. 58m from the rear elevation of the houses on Dennis Road and 33m from the back fence of the houses gardens.

3.10 The side extension will have flat roofs to maintain the existing overall aesthetic of the existing building. The single storey part will be the same scale as the existing building and

the 2 storey corner will be around 7.5m high which is approx. 3m higher than the cantilevered roof over the southern terrace.

- 3.11 In addition to the corner extension, the proposal also proposes to add an external viewing gallery to the existing southern elevation. This will be in the form of a simple steel frame construction sitting directly over the roof of the southern terrace. It will only look across the Golf Course to the South and West and will not provide views to any neighbouring houses.
- 3.12 Since the pre-app, careful consideration has gone into the design of the proposed elevations.
- 3.13 A simple palette of materials has been chosen to incorporate a mix of traditional materials and modern materials. The materials will be a mixture of red and yellow brickwork to relate the proposals to the brickwork elevations of the existing buildings together with the use of dark grey standing seam Zinc cladding which is a high quality material that has a recessive impact on the elevations.
- 3.14 In addition panels of timber cladding will be used to break up the elevations, which will help to reduce mass and bulk. White cladding is also proposed to the viewing area to reference various white panels that are on the existing building.
- 3.15 Long and horizontal canopies have been designed to provide shading to the large format glazing. These, together with the material palette, have been arranged to emphasize the horizontal architecture of the proposals and to make them harmonious with the existing building.
- 3.16 Various other features are proposed to protect the proposals from becoming 'blocky' such as window shrouds and various elevational indents etc.

Pre-Application Submission

3.17 A pre-app submission was prepared and issued to Gravesham Planning Department. The pre-app scheme was largely the same as the scheme now presented.

3.18 In general terms Gravesham Planning Department were supportive of the pre-app submission and the following general comments were offered as response to the overall proposal.

- GBC Leisure Manager – support for the development
- Design South – the general proposals were welcomed and the general form, scale and massing was described as “appropriate” and “well considered”. Concern was raised over the cladding proposals (since adjusted). Concern was raised over the slight step down on the West Elevation, see following. It was pointed out that the new Function entrance should have enough space for pedestrians and this has been addressed. Design South also recommended adding PV arrays to the roof which has been done and suggested that Solar Gain Management be considered to the south facing windows. Both of these have been done. The proposals will have a low level of material harm to the landscape character or loss of actual green space “and could be supported in that respect”.

3.19 The pre-app response concluded that there are no overriding objections to the proposals although it did also say that various supporting statements were needed. Revisions have been made to address the suggestions made.

4.0 POLICY FRAMEWORK

4.1 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.

4.2 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.

4.3 The Development Plan for Gravesham therefore comprises:-

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

Gravesham Local Plan Core Strategy, September 2014

4.4 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.

4.5 The site is shown as being within an urban area (Policy CS02), and fronting on to a local distributor (Singlewell Road) (Saved Policies T1-T5) in the Gravesham Local Plan Policies Map.

4.6 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

4.7 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 also seeks to protect sites designated for their biodiversity value with the highest protection being given to international sites

and then to nationally designated Sites of Special Scientific Interest (SSSI). Opportunities to enhance, restore, recreate and maintain habitats will be sought particularly in Biodiversity Opportunity Areas.

- 4.8 Policy CS13: Green Space, Sport and Recreation indicates that the Council will seek to make adequate provision for and protect and enhance the quantity, quality and accessibility of green space in accordance with an adequate up to date and relevant evidence base.
- 4.9 Policy CS19 (Development and Design Principles) sets out detailed criteria against which the acceptability or otherwise of proposed development will be evaluated. In particular it requires new development to be visually attractive, fit for purpose and locally distinctive. It should 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, layout and form of new development will be derived from a robust analysis of local context and character and make a positive contribution to the street scene and to the character of the area. It requires account to be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings and of the wider context including features of townscape and landscape value, which contribute to local character and sense of place.
- 4.10 It requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and avoid adverse environmental impacts from pollution. New residential development is required to accord with the adopted Residential Layout Guidelines and will be required to provide appropriate levels of private and public amenity space. Proposals should include details of appropriate hard and soft landscaping, protect and where opportunities arise enhance biodiversity and provide appropriate facilities for the storage and disposal of waste.

Saved Policies of Gravesham Local Plan First Review 1994

- 4.11 Saved Policy T1 requires that all proposed developments are adequately served by the highway network identified on the Proposals Map.
- 4.12 Saved Policy P3 requires development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.
- 4.13 In the Gravesham Local Plan First Review the golf course was shown as being within an Area of Local Landscape Significance in policy C5 but this has not been saved (effectively replaced by the Gravesham Landscape Character Assessment. Similarly the Area Policy AP16 relating to the protection of the Mid Kent Golf Course was also not saved.

Review of Local Plan

- 4.14 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.
- 4.15 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 First 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

- 4.16 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 2021, 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.
- 4.17 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 pre-application these should be relied on instead.
- 4.18 The following draft policies from the Regulation 18 (Stage 2) Development Management Policies Document (2020) show the direction of travel the Council is going and are considered as being relevant to the consideration of this application, albeit the weight that these emerging policies may be accorded at this stage is very limited.

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 FW 3: Managing Flood Risk;

Proposed Policy AM 1: Air Quality;

Proposed Policy AM 2: Contaminated Land;

Proposed Policy AM 4: Sunlight and Daylight within New Development;

Proposed Policy AM 5: Noise and Vibration;

Supplementary Planning Guidance and other Documents

4.19 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 the proposal:

- 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).

4.20 The Golf Course lies within the Gravesend Southern Fringe landscape character area which consists of small arable fields and has a gently undulating topography rising from north to south. The dry valley into Gravesend is the strongest landscape feature bringing the countryside into the urban area and creating an attractive approach to the town. It is indicated that the man-made golf course landscape acts as visual detractor.

4.21 It states: To the north of the former A2 corridor, the eastern side of the valley is dominated by a large golf course. There is limited tree cover within the area, mostly consisting of small clumps and individual species located on the golf course, most of which are non-native. The dissected nature of the landscape, vast areas of mown grass and ornamental and evergreen planting within the golf club, accompanied by gappy hedgerows and a lack of native tree cover contribute to a weak ecological integrity

Other Relevant Council Documents

- 4.22 Also of relevance are the published Gravesham Open Space, Sport & Recreation Assessment, Strategy & Action Plan which has two components being the technical based assessments and the Strategy/Standards.
- 4.23 Of particular relevance are:
- Knight, Kavanagh & Page GBC Playing Pitch Strategy Assessment Report, June 2016
 - Knight, Kavanagh & Page GBC Playing Pitch Strategy and Action Plan, August 2016
- 4.24 The above documents provide strategic evidence on what open space, sports and recreational provision is needed within Gravesham and will be used to inform the development of planning policies, including the need for supplementary planning documents. This is carried out in order to inform future planning application decisions and future corporate/strategic development opportunities as and when they arise.
- 4.25 In terms of golf courses the Playing Pitch Strategy Assessment Report, June 2016 identified 4 golf sites in Gravesham and states: The current level of provision is thought to be sufficient for the area. It is not thought likely that future demand will currently generate enough need for another golf course in Gravesham. In part, this is also due to the proximity of other golf courses in surrounding areas.

National Planning Policy Framework

- 4.26 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 or any adverse impacts would so significantly and demonstrably outweigh the benefits or specific policies in the NPPF taken as a whole.

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

- An economic objective;
- A social objective; and
- An environmental objective.

4.28 Paragraph 8, advises that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The social objective is 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.

4.29 Paragraph 47 indicates that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

4.30 Paragraph 92 indicates that planning decisions should aim to achieve healthy, inclusive and safe places which:

(a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of

clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and

(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

- 4.31 In respect of Open Space and Recreation paragraph 98 indicates that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.
- 4.32 Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 4.33 Paragraph 99 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 4.34 Paragraph 111 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 4.35 Paragraph 126 advises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. It regards the effective engagement between applicants, communities, local planning authorities and other interested parties as essential for achieving good design and the creation of high quality beautiful and sustainable buildings and places.
- 4.36 Paragraph 130 indicates that, amongst other things, planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change
- 4.37 Paragraph 129, requires local authorities to ensure that they have access to and make appropriate use of tools and processes for assessing and approving the design of development. They should have regard to the outcome of these processes, including any recommendations made by design review panels.
- 4.38 Paragraph 134, states that permission should be refused for development of poor design that fails to reflect local design policies and government guidance on design.
- 4.39 Paragraph 174 of the NPPF indicates that planning decisions should contribute to and enhance the natural and local environment by, amongst other things: 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.

5.0 ASSESSMENT

Principle

- 5.1 The site is not specifically allocated for the current use or any other forms of development as such in the adopted development plan (Gravesham Local Plan Core Strategy 2014 and

saved policies of the Gravesham Local Plan First Review 1994) being within the urban area of Gravesend.

- 5.2 It is not specifically protected as a golf course. Therefore development proposals would need to be judged against the general policies of the development plan and these would include policies CS01 and CS02 of the Gravesham Local Plan Core Strategy in relation to sustainable development and the scale and distribution of development as well policies CS12 and CS13 in terms of the impact on Green Infrastructure and Green Space, Sport and Recreation including the national planning policies in the NPPF.
- 5.3 The adopted development plan policy in Gravesham Local Plan Core Strategy Policy CS12 (Green Infrastructure) and Policy CS13 (Green Space, Sport and Recreation) support the retention of green spaces that contribute to the green infrastructure and to make adequate provision for and protect and enhance the quantity, quality and accessibility of green space in accordance with an adequate up to date and relevant evidence base.
- 5.4 It is noted that during the pre-app stage, the Borough Council's Leisure Manager supported in principle the refurbishment of the existing built facilities and the inclusion of a second floor.
- 5.5 The NPPF also supports the provision of facilities for enhanced recreation. There is therefore no objection to the principle of the upgrade of the facility.

Visual Impact

- 5.6 The pre-app design had been assessed by the Gravesham Design Surgery with Design South East. The DSE welcomed the proposal and considered that the form, scale and massing to be appropriate and well-considered. Alterations to the proposal have been made in response to the small scale concerns that they raised.
- 5.7 A simple palette of materials has been chosen to incorporate a mix of traditional materials and modern materials. The materials will be a mixture of red and yellow

brickwork to root the proposals in the brickwork elevations of the existing buildings together with the use of dark grey standing seam Zinc cladding which is a high quality material that has a recessive impact on the elevations.

- 5.8 In addition panels of timber cladding will be used to break up the proposals which will help to reduce mass and bulk. White cladding is also proposed to the viewing area to reference various white panels that are on the existing building.
- 5.9 Long and horizontal canopies have been designed to provide shading to the large format glazing. These together with the material palette have been arranged to emphasize the horizontal architecture of the proposals and to make them harmonious with the existing building. Various other features are proposed to protect the proposals from becoming “blocky” such as window shrouds and various elevational indents etc.
- 5.10 The proposed development for extending the existing clubhouse in Singlewell Road would have a relatively low level of material harm to the landscape character or loss of actual green space.
- 5.11 The proposal would present a high quality design and would improve the appearance of the existing building through the introduction of interest and high quality materials to its elevations.

Landscape Impact

- 5.12 A Townscape and Visual Impact Assessment has been undertaken to inform the design of the proposals. This concludes that the landscape impact of the proposal would be negligible, with a minor adverse impact on a nearby copper beech tree with sensitive siting of the proposal and landscaping sufficient to mitigate against it.
- 5.13 The report concludes the visual impact of the proposal to be low-medium and negligible.

- 5.14 The site is extremely discrete, particularly in summer, and visual impacts would be restricted to the adjacent house, its garden and the meadow to the north, all of which are surrounded by woodland.
- 5.15 In winter there will be greater visibility through lines of trees, but far less through layers of lines of trees, hedges or woodland. The colour of the proposed buildings will play a large part in muting such impacts.
- 5.16 In conclusion, it finds that the landscape and visual effects of the proposed in accordance with the suggested mitigation would give rise to a scheme which would be **moderately beneficial** in terms of its visual impact, in character with the local townscape character of Gravesend, creating a development which would enhance its setting, and create a distinctive local landmark on the south side of the town. and would therefore accord with local and national policies in this regard.

Impact on local residential amenity

- 5.17 Policies seeking to protect amenity and ensure acceptable future living conditions are included in the Local Plan Core Strategy. The National Planning Policy Framework (NPPF) also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”.
- 5.18 Safeguarding residential amenity, in terms of privacy, daylight and sunlight and ensuring that all development proposals are fit for purpose and adaptable to meet the need of users’ are important considerations referred to in core strategy policy CS19.
- 5.19 An assessment of the impact on sunlight/daylight of neighbouring properties has been submitted with this application, and it shows that there would be no impact on neighbouring occupiers in terms of loss of daylight or sunlight or overshadowing.

- 5.20 A noise assessment has been undertaken by Lustre Consulting (ref 4301_AC_1.0) and is submitted with the application. It concludes that the worst-case plant noise egress from the Mid Kent Golf Club would be well below the existing daytime ambient sound level at the nearest noise-sensitive receptor. The new noise sources are therefore not expected to contribute to the existing ambient noise environment.
- 5.21 In terms of the BS 4142 assessment, the noise rating level associated with worst-case operation of the new plant would be around 10 dB below the daytime background sound level. This is a positive indication that the likelihood of adverse comment would be low.
- 5.22 As such, the noise impact of the proposal on neighbouring occupiers would be of an acceptable level.

Highways, Access and Parking

- 5.23 The proposed development needs to be considered against Gravesham Local Plan Core Strategy Policy CS11 which states that new developments should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities.
- 5.24 At a national level the NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement are required to be supported by a Transport Statement or Transport Assessment.
- 5.25 The NPPF clearly states at Paragraph 109 that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

5.26 A Transport Assessment and Travel Plan are submitted with the application. These conclude that

- The site is accessible by modes of transport other than the private car for those who wish to use it. The site is served by bus services operated by Redroute and Arriva buses on Wrotham Road and Singlewell Road respectively with bus services to Gravesend Town Centre, Bluewater, Meopham, Borough Green and Sevenoaks. Gravesend train station is about a mile from the site and provides train services to London and Ramsgate and other destinations on route.
- Personal injury accident data on the public highway has been reviewed for the most recent 5-year period and there were no accidents in close proximity to the main site access on Singlewell Road. The proposed development is not expected to result in a material impact on the accident rate in the area with the expected low development trip impact.
- Any overspill parking onto the public highway is extremely unlikely to occur. The proposed increase in the bar/lounge floor area is only 265sqm and the trip impact of this is considered negligible.
- The busiest golfing events at the site, such as the Pro-Am tournaments etc, will not be attended by any more people than currently do and nongolfing events at the clubhouse would not be permitted to occur on these days in any case.
- The proposed development accords with highway access design recommendations and sustainable values, hence there is no basis for highway and transportation objections to the development. In relation to the National Planning Policy Framework, the impacts are not severe and there is a presumption in favour of the Development.
- It is concluded that there are no highway reasons why planning permission for the proposed development should be withheld.

Contamination and Ground Stability

- 5.27 In view of past uses of the site including existing car parking areas and storage buildings, it was advised at pre-app that there may be the potential for contamination on the site although the Council's Environmental Health Officers suggests that only a watching brief would be necessary. A watching brief has been submitted with the application for approval in accordance with this request.

Drainage/Flood Risk

- 5.28 The site does not suffer from any problems associated with drainage or flooding and the site is not within a flood zone. Matters of drainage will be dealt with through the building control regime and therefore, in accordance with guidance in the NPPG, should not be replicated through the planning process.

Trees and Landscaping

- 5.29 The development would not have any impacts on trees and hedging on the site.
- 5.30 The golf club is obviously dominated by lawns, hardstanding to paths and patios and also includes various flower beds generally planted to the borders of buildings etc. These will simply be adjusted to accommodate the new extensions.
- 5.31 Currently the Western side of the building contains a slightly untidy collection of storage buildings, containers, and detritus that have built up in the running of the club. This has been screened as much as possible but is visible in the landscape. The new scheme will clear this away and open up the Western side of the Clubhouse to the car park area giving an enhancement to the landscaping.

Biodiversity and Ecology

- 5.32 Under policy CS12 of the Gravesham Local Plan Core Strategy and critically also at national level within the NPPF there is a requirement that there should be no net loss in biodiversity and moreover a net gain and therefore again any loss of grassland, planting and hedging should be positively compensated in the future planning submission.
- 5.33 Ecological survey work has been undertaken and is submitted with the application. This identifies no likely impact on any ecological asset and makes recommendations for biodiversity enhancement. Implementation of this can be required by condition.

Heritage and Archaeology

- 5.34 At pre-application stage, Kent County Council Heritage and Conservation advised that the club house was the site of a Second World War air raid wardens post built around 1939, located in the entrance area of the Mid-Kent Golf Course, on the western side of Singlewell Road, Gravesend, and it was a local focus in the incident reporting chain for coordinating the emergency services in the event of injury or damage resulting from an air raid. It was also a place from which patrolling wardens enforced blackout restrictions in their community. It would have been decommissioned in 1945 and was demolished around 1970.
- 5.35 It is possible therefore that below ground remains exist and if development were to proceed Kent County Council Heritage and Conservation recommends a simple archaeological watching brief during groundworks is undertaken. This is submitted with the application.

Energy and Sustainability

- 5.36 An energy and sustainability statement is submitted in support of the submission.

6.0 CONCLUSION

- 6.1 The scheme has already been supported through the pre-application process with the suggestion of small changes.
- 6.2 These changes have been implemented and the survey work requested has been carried out and is submitted with the application. The surveys raise no additional causes for concern with the submission.
- 6.3 As outlined above, the proposal would result in a visual enhancement to the building and will improve the provision of the clubhouse in accordance with local and national planning policy.
- 6.4 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal represents sustainable development that would meet the 11 economic, social, and environmental objectives of the NPPF and would accord with the development plan.