

Mid Kent Golf Club
Singlewell Road
Gravesend
Kent
DA11 7RB

Fresh submission for erection of a single storey side extension on the western side of the existing club house and the refurbishment of the club house (reduced version of approved scheme – 20220795)

1.0 Background

- 1.1 Planning permission ref [redacted] was granted for 'Erection of a two storey side extension on the western side of the existing club house and including the refurbishment of the club house'
- 1.2 Since the above scheme was in design, development construction costs have risen significantly and therefore the Golf Club has decided to reduce the extent of the proposed works.
- 1.3 When the applicant began to explore reducing the scale of the proposals the strategy for amendment was discussed with the Planning Officer (Mr P Price) and it was agreed that the changes could be dealt with as a Minor Material Amendment (MMA) with a phased approach (PP e-mail dated 6.12.22).
- 1.4 However, the Council proceeded to determine that this was not the case and subsequently refused permission for the reduced scheme under application ref 20230304 on the following ground:

‘The proposed development seeks to change the scale and design of the extensions to the building by removing the first floor viewing gallery and the first floor element of the side extension. The proposed revised design completely alters the nature of the development and would result in a development that would differ materially from the approved permission. As a result this proposal goes beyond the scope of Section 73 of the Town and Country Planning Act 1990 and is contrary to guidance within the National Planning Practice Guidance, specifically paragraph 001 Reference ID: 17a-001- 20140306.’

- 1.5 This submission is therefore a new full application for a reduced version of the permitted scheme. Other than the reduction in scale, all else remains the same.
- 1.6 The first floor extension and viewing gallery are no longer proposed. Therefore, in all regards the amendment will have a reduced impact on its surroundings and the site.

2.0 Review of 3rd party reports as submitted with the Planning Application:-

Lighting Impact Survey (LIS) – by BSG

- 2.1 The proposed external lighting design as set out in the assessment has been designed to be as simple and unobtrusive as possible and to use minimalist light sources.
- 2.2 The scheme proposed to up light the structural columns on the south and west side on both floors using narrow beam uplights.
- 2.3 These same lights were proposed to upwash the light-coloured wall at the far ends of the colonnade. Additional trimless recessed downlights are proposed for general task lighting in the covered terrace.

- 2.4 The scheme proposed that the first-floor gallery would be lit with the same lighting and behind each column and without independent task lighting. A decorative light was also included to light the parts of the walling.
- 2.5 The LIS concluded that *“there are no issues as regards to spill of intrusive light to neighbouring properties surrounding the proposed site.”*
- 2.6 The proposed reduced scheme will have no first floor or first viewing gallery and therefore will have a reduced impact and therefore should be considered to be acceptable.

Energy Statement (ES) by MES Building Solutions.

- 2.7 The executive summary of the ES states that the total energy requirement of the development has been calculated using Part L 2013 Sap calculations and indicative SBEM calculations. Additionally, SAP10 carbon factors have been applied to the modelled energy consumption to calculate the CO2 emissions.
- 2.8 The IS set out that Photovoltaics are a suitable technology for use on this site and especially because of the amount of flat roof available. The report set out that the first-floor part was an impediment to the panel locations but that even so 20 panels could be installed (see fig 3.2). Now that the first floor is to be removed the scope of PV installation could, if needs be be enhanced and thereby improve the outcome of the IS.
- 2.9 Section 3.3 sets out the initial goal of reducing energy consumption through the enhancement of thermal elements. Table 3c sets out a number of thermal elements and enhanced target U values to be sought in the design. The amended scheme won't amend this approach.

- 2.10 Overheating calculations were modelled the planning submission and the only area that showed a potential for overheating was the existing bar area (see Section 4 of the report). The reduced scheme will produce the same results for overheating.
- 2.11 Therefore the reduced design proposal still achieves the aims of the accepted strategy which are mainly the deployment of PV's and an Air Source Heat Pump.

Sun Studies – by MKA Architects Ltd.

- 2.12 The sun studies showed the new 2 storey extension did not adversely affect neighbouring properties. Clearly the removal of the first floor can only improve overshadowing to neighbouring properties.

Transport Statement – by Considine.

- 2.13 The submitted and approved Transport Statement set out that the existing car parking provision was adequate for the club and its new extension. Now that the extension is reduced in size the approved car parking will therefore be adequate.
- 2.14 The statement states that the club currently provides and will still provide 150 car parking spaces including disabled spaces and that events at the Club usually have a maximum accommodation of around 120 people. Additionally, the report identifies that the car parking for a Golf Course should have a maximum of 3 spaces per hole. There are 18 holes and that therefore equates to 54 spaces meaning that the existing provision is well in excess of the required standards.
- 2.15 The report concluded that the site is accessible using a number of modes of transport and including the private car and that the trip impact of the 2-storey extension would have a negligible effect on trip impact.

- 2.16 In general terms the Transport Statement concluded that the existing provisions were more than adequate, that the chance of parking overspill to the street was highly unlikely and that there could be no highway reasons where the scheme would receive material planning objection. Since the amended scheme is smaller than the consented scheme clearly it cannot have a more detrimental impact on Transport than has already been consented.

Noise Assessment – by Lustre Consulting.

- 2.17 Lustre Consulting reviewed whether the introduction of new plant items has the potential to result in elevated noise exposure at neighbouring properties set against the existing prevailing sound environment.
- 2.18 The report identified that only new plant such as the proposed Air Source Heat Pump (ASHP) need consideration as a possible change to the existing noise environment at the noise sensitive receptors (NSRs) in the vicinity of the clubhouse, the closest being the garden to the houses to the North.
- 2.19 The report identified that the ASHP was likely to be a Mitsubishi Ecodan and be in the Western side of the building. The report considered the possibility of two of these units working continuously and at full capacity.
- 2.20 At 4.5 the report states that worst-case noise levels of 27 dB(A) can be expected at the nearest NSR and that this is 15dB below the typical noise sound level which is 10 dB below the noise rating level limit and therefore sufficiently low to not contribute to the existing noise environment and therefore is also considered to be a positive indication of low impact.
- 2.21 The amended scheme does not make any adjustment to the expected plant noise and specification of ASHP's to the West of the building and therefore does not

represent a worsening situation. It therefore remains in line with the conclusions of the submitted and consented report.

Travel Plan – by Considine.

- 2.22 The Travel is a package of measures aimed to encourage more transport use rather than the use of private cars. It will require implementation by the Club and the Clubs Travel Plan Co-ordinator.
- 2.23 The amended design proposals will have no adverse effect on the Travel Plan details and proposals, they will remain the same.

Contamination Watching Brief – Lustre Consulting

- 2.24 The watching brief sets out what should happen if contamination is discovered during the construction of the project. The reduced design scheme has no material effect on the consented Watching Brief.

Townscape and Visual Impact Assessment – Louise Hooper Landscape Architect

- 2.25 The Townscape and Visual Impact Assessment (TVIA) has been prepared to show early indication of any potential townscape or visual impacts on the site or its context so that allowance can be made for mitigation if needed.
- 2.26 In section 5.2 the TVIA identified that all landscape impact of the development were negligible except for a single item which has a minor adverse impact on a Copper Beech tree. The report states that mitigation should be applied when items are identified as “adverse” or “moderately adverse”.

2.27 In section 6.2 The assessment states that the site is “very well screened” also considered visual influence; - these being to areas beyond the western boundary of the site and the entrance area. The assessment states that Visual Receptors (VRs) such as slow-moving pedestrians and cyclists. The view from the entrance area on Singlewell Rd was considered to be a “low-medium” VR and the “filtered views” from the West were considered to have a “negligible” impact on VR’s.

2.28 In addition Table 7 set out that 4 out of the 5 VR’s give rise to a “negligible adverse impact” and the 5th to a “low adverse impact”. Additionally, the visual impact from Dennis Road South, Singlewell Rd East and Singlewell West were considered against the sensitivity of the neighbours. 2 out of three are recorded as “moderately adverse and the 3rd “negligible”. The VR’s on Singlewell Rd and Dennis Rd are therefore considered against possible mitigation both of which score “moderately beneficial”. The mitigation suggested in both is tree and shrub planting.

2.29 The TVIA concludes that the overall proposed development has the following effects: -

Landscape – **minor adverse**

Visual – Neighbours A & B (Denis Rd and Singlewell Rd East) - **moderately adverse** with mitigation this could become **moderately beneficial**

Visual – Neighbours C – views to frontage of Club House could be mitigated with planting to achieve **moderately beneficial** visual impact.

2.30 In overall terms the assessment sets out that with minor mitigation measures the overall development would be **moderately beneficial**. The proposed changes to the consented scheme result in a lower building with less mass and therefore it must be concluded that its impact in landscape and visual terms will be less than the approved scheme and therefore represent no greater impact than has already been consented.

Preliminary Ecological Appraisal (PEA) – KB Ecology

2.31 The PEA is a scoping study and desktop study to demonstrate compliance with wildlife legislation and planning policy objectives by identifying ecological significance on the site and its surroundings, assessment the potential presence of protected species, habitats and other biodiversity features, provide recommendations for further surveys, suggest potential enhancements, present the likely significance of ecological impacts on the development and provide early indication of potential ecological mitigation and compensation requirements if necessary.

2.32 The PEA judged that: -

Great Crested Newts - unlikely to be present.

Slow worms - unlikely to be present because the site is mainly mown grassland which is species poor and unsuitable for common reptile species.

Hazel Dormouse – considered the site has no potential for these.

Badgers – there were no signs of setts or badgers on the site.

Bats – No signs of bats were found on the site. A very limited number of potential access points were found. The PEA considers the Western side of the building to have low suitability for bat and the rest of the building to have negligible suitability.

Additionally, none of the trees on the site offered suitability for bat roosting.

Other species – the PEA considered that Hedgehogs have the potential to be supported on the site.

2.33 The PEA set out that the site is not considered to be detrimental to any protected species and that the LPA are not required to consult Natural England.

2.34 Mitigation and compensation were considered and the following stated: - trees should be protected during the works, consideration to be given to the time of

development on the basis that the site contains suitable habitat for breeding birds (vegetation clearance to take place outside of nesting season (March to August inclusively). It is recommended that a night-time bat survey is undertaken between May and August – see 13.0 below. With regards to Hedgehogs the recommendation is that hand searching is done before prior to disturbance and that excavations should not be left open.

2.35 General enhancements are suggested in 4.10.

2.36 Given the findings of the PEA, that consent has been obtained for a larger scheme and that the proposed building footprint of the amended scheme has not altered then the findings of the PEA should be considered to remain the same for the amended scheme.

Bat Survey – KB Ecology

2.37 As recommended in the PEA a night-time Bat Survey was undertaken in June by two surveyors. No bats were seen emerging from the building during any surveys. A single noctule bat was seen and heard commuting. Therefore, KBE have stated that the building should not be considered as being used for bat roosting and that no mitigation or licence is expected or needed prior to any construction works.

2.38 The reduced design scheme does not affect the Bat Survey findings and there will be no need to provide an additional Bat Survey.

Archaeological Watching Brief (AWB)– Canterbury Archaeological Trust Ltd.

2.39 The aim of the AWB is to set out measures and processes that must take place to preserve any items found of archaeological significance before and during the construction works. This will apply in full to the adjusted proposals. Details were

subsequently approved under details submission ref 20221330 and the implementation of these could be approved in any permission.

Planning Statement – MKA Architects Ltd

- 2.40 The Planning Statement sets out the background of the site and Golf Club, relevant recent planning history and the proposals against the Policy Framework. Since this document generally sets out and justifies the principle of development then it remains relevant to the amended scheme.

Conclusion

- 2.41 The amended scheme has the same footprint and general aesthetics as the consented scheme. The reduction in size is accomplished by removing the 1st floor part of the scheme together with its neighbouring 1st floor viewing gallery. These two parts were only a part of the consented scheme. The consented scheme was part single storey and part two storey. It will now be solely single storey.
- 2.42 The scheme will have reduced impact in terms of mass and bulk and therefore impact but will still deliver the additional facilities to the Golf Club and through the Gold Club to other users and therefore will still achieve its goal of providing additional community facilities.

As above all of the submitted supporting reports remain relevant to the proposals or show that the adjusted scheme has a reduced impact.

The Architectural design of the reduced scheme is the same in footprint, materials and general layout as the consented scheme, the only difference being the removal of its first floor and viewing gallery. It therefore remains in accordance with the principle of development as established through pre-app and through the recent

consent. There are no other material changes to the site or the planning framework that would lead to a different conclusion that that previously reached.