



Delegated Report

Planning Application

Planning Application No: 20240943

Location: Cobham Sports Association Recreation Ground The Street Cobham

Description: Extension of the pavilion patio and provision of disabled access to the clubhouse and the patio, with associated alterations

Applicant: Mr Chris Broadley, Cobham Sports Association

Site Visit Date: 27.11.25

Submitted Documents/Plans

Application Form;
Supplementary Information – BNG Metric;
Supplementary Information – Heritage Statement;
Supplementary Information – Baseline Maps for BNG;
Supplementary Information – Planning Design and Access;
Drawing No. 1 – Floor Plans – Existing;
Drawing No. 2 – Floor Plans – Proposed;
Drawing No. 3621.010.A – OS Plan;
Drawing No. 3621.020.A – Block Plan – Existing;
Drawing No. 3621.030.A – Block Plan – Proposed;
Drawing No. 3621.050.A – Elevations – Existing; and
Drawing No. 3621.070.C – Elevations – Proposed.

Relevant Planning History

Reference	Description	Decision	Decision Date
19920524	Erection of single storey side extension to the sports pavilion to form dressing rooms and referee's changing room.	Permitted	12.11.1992
19990016	Siting of a Calor gas storage tank.	Permitted	01.06.1999
19750730	Erection of a pavilion	Permitted	18.11.1975

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas

Paragraph 34 of the NPPF (2024) sets out that 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 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 that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- Rural Conservation Areas Appraisals SPD Management Plan (2016)
- Cobham Conservation Area Appraisal (2017)
- Kent Downs National Landscape Management Plan (2021-2026)

Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Consultations, Publicity and Representations

Consultation was carried out when the application was first made valid. However, during the course of the application, it was noted that the documents and plans submitted with the application were insufficient and the application was made invalid. Once the required information was received, the application was revalidated with reconsultation carried out. The below comments are in response to the reconsultation carried out, apart from the National Landscape Unit, who did not provide comments during the reconsultation period, but provided initial comments. This is annotated below accordingly for clarity.

Consultees

GBC Conservation Officer

No comments received.

KCC Biodiversity Officer

SUBJECT: 20240943 / Cobham Sports Association Recreation Ground, Cobham

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

SUMMARY: SUFFICIENT INFORMATION

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination, provided it is confirmed that the submitted metric calculations accurately reflect the red line boundary. Recommended condition/informative wording is provided in Appendix 1.

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	+49%	N/A	1 – all on-site	No

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as significant and so does not require securing for 30-years.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information⁴, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	No	The application form indicates that the applicant understands a de-minimis exemption to apply. However, the area of affected habitat (44.88 square metres of garden) is just above the amount of affected habitat required to qualify for de-minimis (25 square metres). We therefore consider that mandatory 10% BNG does apply to these proposals.
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes	A site survey was carried out 6 th August 2025 by a planning consultant. Given the types of habitats found to be present on-site and evidenced through aerial imagery and photographs of the site, we are content that this individual has the competency to identify the habitats present on-site. The date of 6 th August is acceptable to inform the application.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	-
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes	The site is 74.25 square metres in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (1107.43 square metres) does not match the reported red line

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

⁴ References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

		boundary site area as per the application form. The habitat area reported in the metric calculations and shown on plans needs to reflect the red line boundary. Confirmation should be sought from the applicant that the submitted metric calculations accurately reflect the red line boundary. We are content with the baseline habitat classifications, although we query whether the artificial unvegetated surface should be instead recorded as developed land; sealed surface, if it represents the footpath. However, this makes no difference to the results of the calculations, although it would benefit from being accurate and updated. A short description of the habitat types in the user comments section of the metric calculation tool would have been helpful for clarity. A biodiversity net gain is proposed to be achieved through the planting of two trees.
A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have: - a statement to the effect that these activities have been carried out; - the date immediately before these activities were carried out; - the pre-development biodiversity value of the onsite habitat on this date; - the completed metric calculation tool showing the calculations, and - any available supporting evidence of this.	No	The applicant has not provided a statement to this effect, although aerial imagery dated between April 2020 and August 2025 does not show evidence of any on-site habitat degradation.

A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).		None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes	

Significant On-site Gains

Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

Non-significant enhancements are those whose loss will not significantly decrease the development's biodiversity value e.g., private gardens or container planting. These types of enhancements do not normally require maintenance provisions and so no Habitat Management and Monitoring Plan, legal agreement or commitment to maintain them is required.

There is no on-site significant habitat identified on-site for legislative biodiversity net gain. However, we recommend that a typical landscaping condition secure the establishment of the proposed trees on-site to ensure that a 10% biodiversity net gain is achieved for this development.

Table 3, Appendix 2 takes elements from the national and local guidance to show how we have calculated the significance of habitats on-site. This site qualifies for use of the small sites metric.

Ecological Impact Assessment

No ecological information has been submitted with this application. As a result of reviewing the data available to us and the information submitted with the planning application, we advise that none will be needed. This is due to the small scale, nature and location of the proposals and limited potential for impacts to protected and priority species and habitats⁵.

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Bloomfields (October 2025) Proposed Elevations. P.3621.070.C.

Bloomfields (September 2025) Existing Elevations. /3621.050.A.

Bloomfields (September 2025) Site Location Plan. /3621.010.A.

Bradley, C. (October 2025) Gravesham Borough Council. Application for Planning Permission. PP-13458016. Cobham Sports Association, DA12 3BN.

Unauthored (Undated) Planning, Design and Access Statement. Sports Pavillon and Recreation Grounds, Cobham Village, DA12 3BN.

Unauthored (Undated) Habitat Plans. Baseline and Post-Development.

⁵ We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

Appendix 1: Suggested Conditions/Informatives

Biodiversity Net Gain

Deemed Condition Informative

Please note that certain information is required to discharge the biodiversity gain condition. The government's published Biodiversity Gain Plan (BGP) template¹² should be submitted with the application to discharge the biodiversity gain condition. This template also indicates which other documents and plans should support the application for discharge.

If planning permission is granted, the statutory biodiversity gain condition (and its reason for imposition) should not be included on decision notices as a condition. The condition cannot be varied or removed. An application must be made to discharge it as any other condition.

We recommend an informative in line with the Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)¹² should be included on the decision notice to set out the legislative requirements in relation to biodiversity net gain.

Landscaping Condition

Habitat creation and enhancement on-site can be secured by condition. We do not consider that any of the proposed on-site habitats shall likely qualify as significant⁹ enhancements in line with mandatory 10% biodiversity net gain, requiring on-going oversight by the Local Planning Authority and securing for 30 years. However, although no on-going monitoring and oversight by the Local Planning Authority is considered likely to be necessary, to secure on-site compensation for lost habitats, a simple and standard landscaping condition should secure the planting of the proposed trees and their reinstatement should they die within 5 years of planting.

This is because the proposed habitats still contribute to the mandatory 10% biodiversity net gain that needs to be secured as part of the development and the proposed habitats will still require some form of management to achieve the desired outcomes for biodiversity. Providing on-site enhancements will also meet national and local policy requirements.

Appendix 2: On-Site Significance Calculator

Table 3: On-site Significance of Habitats Calculator

Row No.	On-site Habitat	Present (Y/N)	No. of Habitat Area Units	No. of Hedge Units	Comments
1	Created habitats of medium distinctiveness	Y	0.0249	-	Planting of two small trees
2	Created habitats of high distinctiveness	N	-	-	-
3	Created habitats of very high distinctiveness	N	-	-	-
4	Created habitats of low distinctiveness making up many biodiversity units (BU) relative to biodiversity value pre-development	N/A	-	-	Local guidance indicates that the creation of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.
5	Created habitats have increased distinctiveness compared to pre-development (e.g., modified grassland to other neutral grassland)	Y	-	-	Two trees have higher distinctiveness than vegetated garden.
6	There have been enhancements proposed to the raise the distinctiveness of retained habitats.	N	-	-	-
7	There have been enhancements proposed to the condition of retained habitats	N	-	-	-

8	Habitat creation or enhancement of low distinctiveness habitats or higher is significant in area relative to size of development (excluding individual trees and vertical habitats).	N/A	-	-	Local guidance indicates that the creation/enhancement of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.
Total biodiversity habitat units (BU) delivered by relevant creation/enhancement action: 0.0249					
The above table indicates that the on-site habitat is not considered significant because as the created habitat is under 0.5 biodiversity units.					

* National guidance indicates that significant enhancements contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development e.g.:

- o Habitats of medium or higher distinctiveness in the biodiversity metric;
- o Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- o Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- o Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- o Enhancements to habitat condition.

** In Kent, guidance indicates that the delivery of above 0.5 (total) relevant biodiversity units is considered the threshold for on-site significance for created or enhanced habitats.

*** Private gardens and container planting are not considered significant enhancements in national guidance and have not been included in the above table.

**** Cropland habitats (except arable field margins, and winter stubble where providing mitigation/compensation for wintering birds), Rhododendron scrub, introduced shrub and culverts cannot be considered significant enhancements in local guidance and have not been included in the above table.

Kent Downs Landscape Unit

Please note these comments were received in the first round of consultations:

Thank you for your recent consultation on the above.

On 22 November 2023, all designated Areas of Outstanding Beauty (AONBs) in England and Wales were renamed 'National Landscapes' (NLs). Accordingly, the Kent Downs AONB is now the Kent Downs National Landscape. Its legal designation and policy status remain the same.

Also of note is the changes introduced through the Levelling-Up and Regeneration Act 2023, which came into force on 26/December 2023. The Act amends the Countryside and Rights of Way Act, which is the primary legislation relating to AONBs and replaces the previous Duty of Regard to AONBs set out at S85 with a new, strengthened requirement that:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. (Part 12 - Miscellaneous; Section 245. Protected Landscapes; paras (5) - (10).

This places a much stronger duty on relevant authorities, which includes local authorities, to ensure that their actions and decisions seek to conserve and enhance AONBs, marking a significant change to the legal context of AONB policy.

The Kent Downs National Landscape team has seen a recent uplift in the number of consultations on planning applications. In accordance with the agreed Kent Downs Planning Protocol, which sets out that the Kent Downs Landscape team will only have a limited land use planning role and will prioritise its involvement in planning to planning policy matters, we will not normally provide bespoke comments on more minor applications such as this. This does not imply support for, or objection to, the proposal. If our input would be particularly valued in this instance, please get in touch and we endeavour to provide informal advice where our current planning capacity allows.

In determining the application, the local planning authority has a new statutory duty, as set out above, to seek to further the purpose of conserving and enhancing the natural beauty of the Kent Downs National Landscape. Further advice on the new duty is provided in Appendix 2 of this letter. The Kent Downs National Landscape team recommends that to help fulfill the new statutory duty, the Local Planning Authority should ensure that the decision is consistent with relevant national and local planning policy and takes into account the aims, objectives and principles set out in the Kent Downs AONB Management Plan and its associated guidance documents. Further details of these are provided in Appendix 1.

Sport England

Thank you for re-consulting Sport England with revised/additional information on the above application.

We have reviewed all the submitted documents and are disappointed that none of concerns which we raised on the 7th of February 2025, regarding the internal layout have been addressed.

Notwithstanding this, our position remains the same, as it is clear the extended patio will not have a detrimental impact on to the existing cricket pitch. Therefore, we are content that the proposal meets our E3 planning policy exception.

For Clarity Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 3 of our Playing Fields Policy and paragraph 104 of the NPPF.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Cobham Parish Council

No comments received.

Local Ward Councillors

No comments received.

Neighbouring properties

Five surrounding properties were consulted, a site notice was displayed on 21.10.25 and the application was publicised in the paper. The overall consultation period expired on 14.11.25 and no representations were received.

Site Description and Proposed Development

The pavilion is situated within the Recreation Ground, under Cobham Sports Association. This application proposes the extension of the pavilion patio and provision of disabled access to the clubhouse and the patio, with associated alterations.



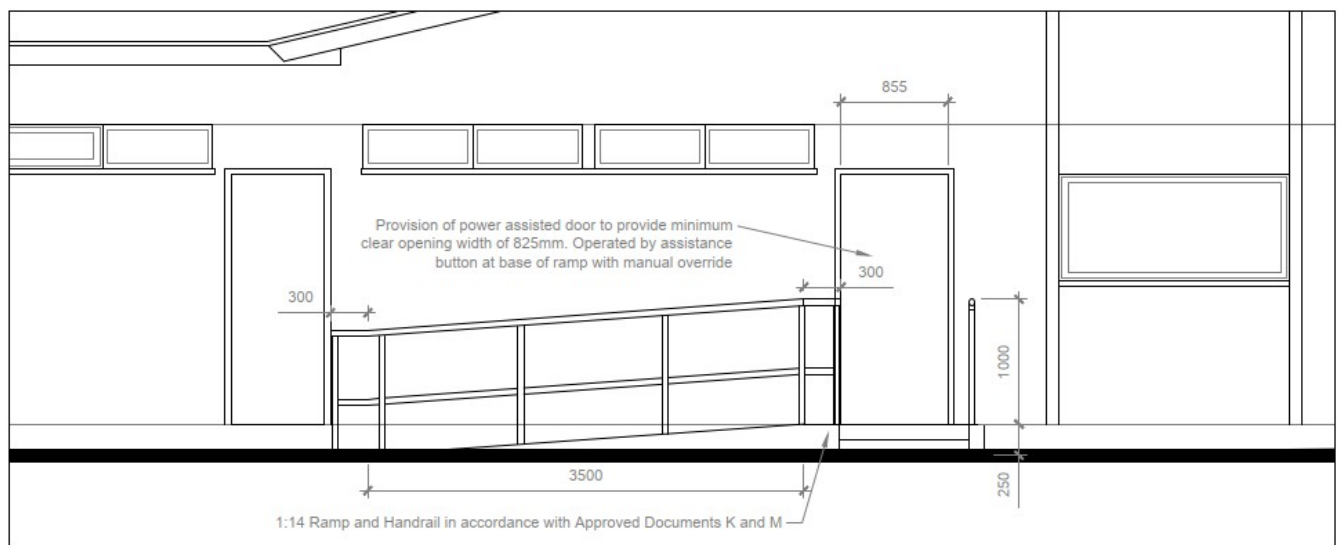
Site Photos



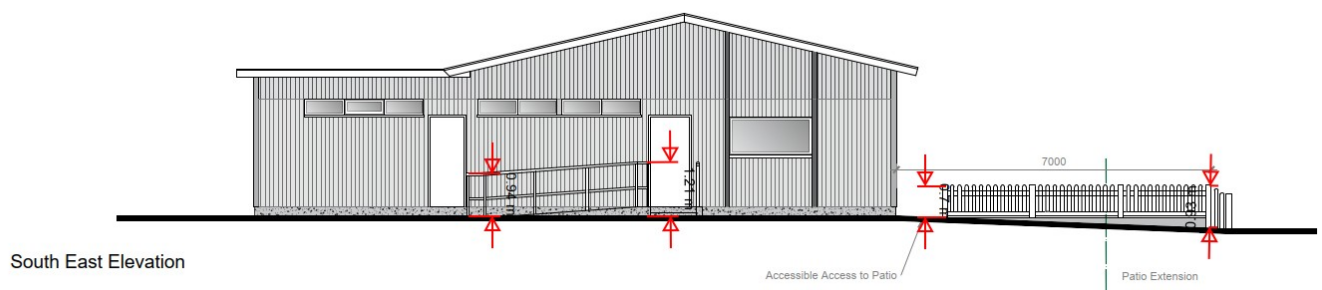
The site lies within the Cobham Conservation Area, the Kent Downs National Landscape, the Ashenbank And Cobham Parkland Landscape Character Area and the Green Belt.

Case Officer measurements are indicated on the plans below:

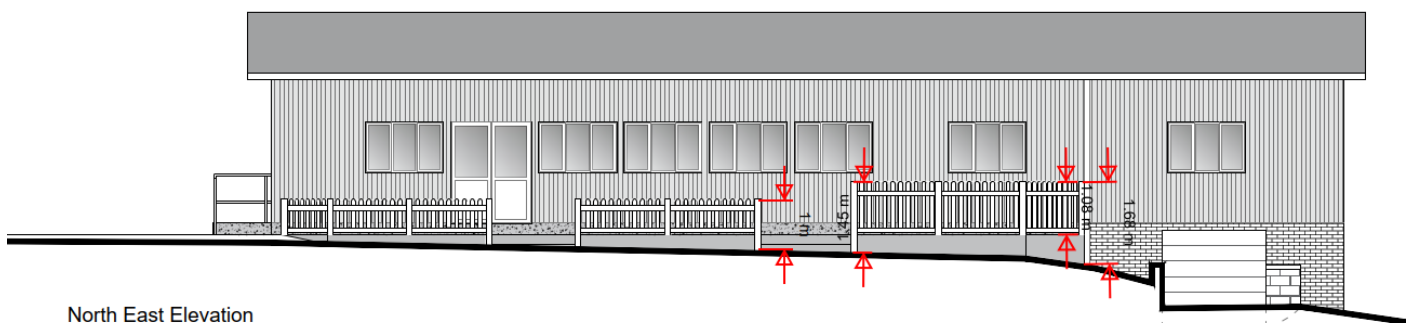
Proposed:



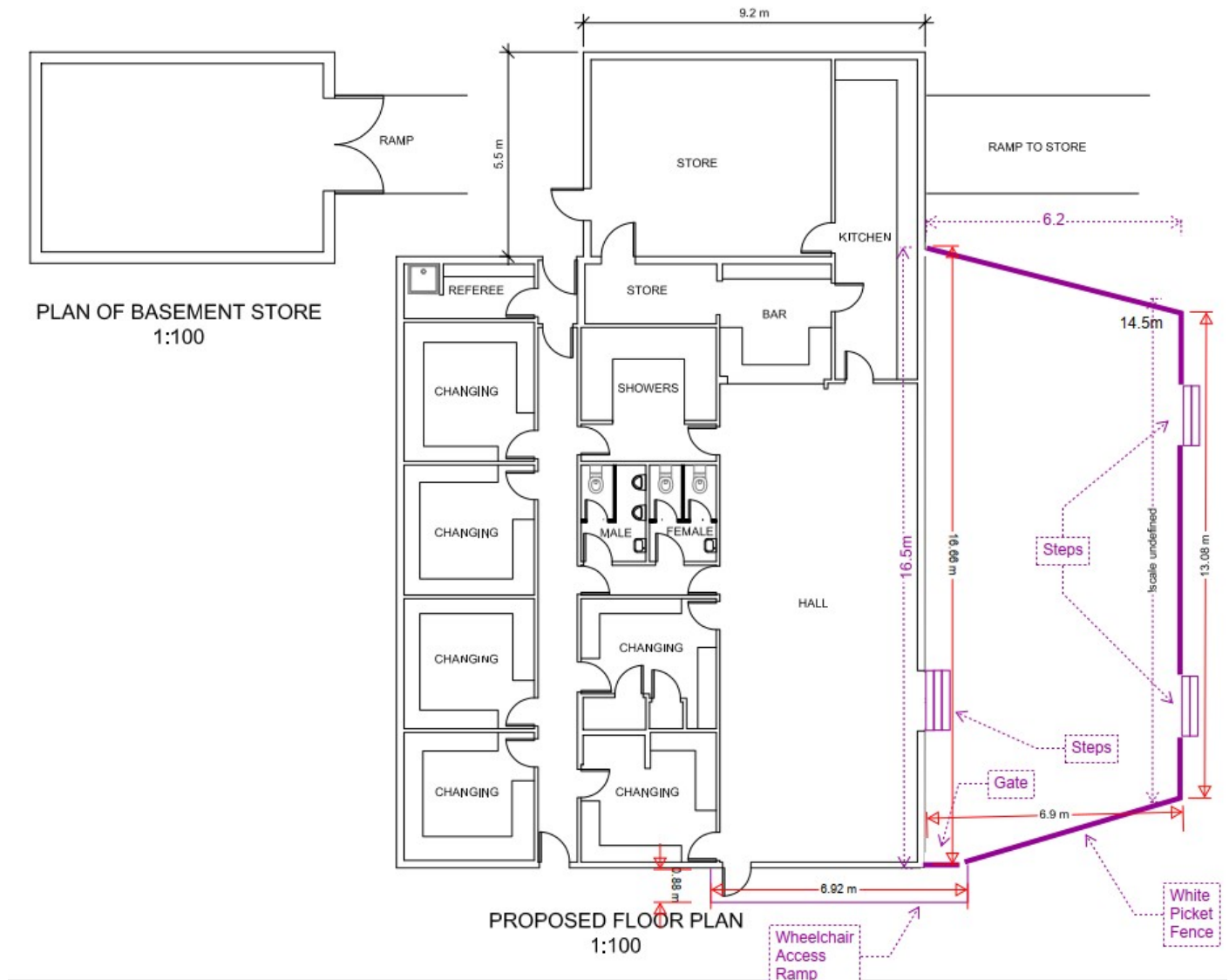
Proposed Accessible Entrance



South East Elevation



North East Elevation



Officer's Analysis

Principle of the Development

The application site is located within the Green Belt, as defined by the Local Plan, and as such Policy CS02 (LPCS) is relevant. Development in the urban area is prioritised as the sustainable location for development. In the rural area, Policy CS02 states that development will be supported within rural settlements that are inset from the Green Belt and defined on the policies map. Development outside those settlements, i.e. in the Green Belt, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the LPCS.

The principle issues in determining this application are;

- Green Belt;
- The effect on the character and appearance of the area, conservation area and landscape;
- Amenity;
- Parking and Highways; and
- Biodiversity.

Green Belt

Is the proposed development appropriate in the Green Belt?

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 142 of the NPPF 2024), with the Green Belt serving five purposes (paragraph 143):

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Paragraph 153 of the NPPF (2024) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Footnote 55 includes the caveat; *Other than in the case of development on previously developed land or grey belt land, where development is not (my emphasis) inappropriate.* An assessment on whether the site falls under previously developed land or grey belt land shall be considered in the relevant section of this report. Beforehand, consideration of whether the proposed development is inappropriate must be made.

A Local Planning Authority should regard development as inappropriate in the Green Belt unless it falls within the specified exceptions of paragraphs 154 and 155 of the NPPF (2024). Paragraph 155 is not relevant to this proposal. There is not a demonstrable unmet need for the development proposed and as such, the remaining parts of paragraph 155 do not need to be considered. Paragraph 154 is set out below:

154. Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) 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;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- i. mineral extraction;
- ii. engineering operations;
- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

In the case of this application, it is considered that paragraph 154. (b) is relevant:

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

The consideration of exception (b) shall now be made. This exception also requires an assessment of openness.

The proposed development would provide appropriate facilities in conjunction with outdoor sport and recreation. The ramp would result in improved accessibility for the community, and the extension of the patio area would provide additional space for members, families and the community. The development is not considered excessive and is considered to represent appropriate facilities for the site.

As per the Government guidance (paragraph 013 Reference ID: 64-013-20250225):

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness*
- *the degree of activity likely to be generated, such as traffic generation*

In situ, the limited development of the site, is not considered to be harmful to the openness of the Green Belt, and overall, the openness is considered to be preserved.

As the development is considered to fall within the aforementioned exception, the development is not considered to be inappropriate and further assessment, including special circumstances is not required.

Therefore the proposal complies with Policy CS01 (Sustainable Development) and Policy CS02 (Scale and Distribution of Development) of the Gravesham Local Plan Core Strategy (2014) and Section 13 of the National Planning Policy Framework (2024) (Protecting Green Belt Land).

Impact on the Conservation Area, the Landscape and, Design, Character and Appearance

The site is located within the Cobham Conservation Area and as such, a principle issue in determining this application is whether the proposed development will preserve or enhance the character and appearance of the Conservation Area. As such, Policies CS20 of the Gravesham Local Plan Core Strategy (LPCS) (2014) and Saved Policy TC3 of the Gravesham Local Plan First Review November 1994 are relevant, as well as Section 16 of the National Planning Policy Framework (NPPF) (2024). These policies place a high priority on the preservation, protection and enhancement of the heritage and historic environment.

In addition, the property is situated within the Kent Downs National Landscape, and the Ashenbank And Cobham Parkland Landscape Character Area. Relevant Policy considerations include paragraph 187 of the NPPF 2024, which aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. Policy SD2 of the Management Plan 2021-2026 recognises the need to conserve and enhance the local character, qualities, and distinctiveness of the National Landscape and Policy SD8 seeks to ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the National Landscape. Policy CS12 (LPCS) (2014) seeks to protect the green infrastructure within the Borough and states at 5.7.26 the overall landscape character and valued landscapes will be conserved, restored and enhanced.

Furthermore, Policy CS19 (Development and Design Principles) (LPCS) (2014) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area. Moreover, Section 12 (Achieving well- designed places) of the NPPF (2024) sets out that developments should function well and add to the overall quality of the area, be visually attractive and sympathetic to local character.

In addition to the above, the Design For Gravesham Design Code (2024) is a strategic document that sets out Gravesham's vision and expectation for quality place-making.

The proposed alterations would ensure the Pavillion would be accessible, as well as providing an enlarged patio area for members, families and the community as a whole. The ramp would be constructed on the south eastern flank of the pavilion, which is an existing hardstanding area. The patio, located adjacent to the north eastern elevation of the pavilion would be extended, with the crumbling brickwork of the existing wall surrounding the patio, to be replaced, and the installation of a white picket fence to frame the patio area.

In situ, the proposed development is not considered to harm the landscape, design character and appearance of the existing pavilion or the conservation area.

Overall, in terms of design, the proposed development is considered to accord with Policies CS12 (Green Infrastructure) and CS19 (Development and Design Principles) of Gravesham's Local Plan Core Strategy (LPCS) (2014), along with Section 12 of the National Planning Policy Framework (NPPF) (2024). Furthermore, the development is in accordance with statutory test 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Policy CS20 (Heritage and the Historic Environment) of the Gravesham Local Plan Core Strategy (2014), saved Policy TC3 (Development Affecting Conservation Areas) of Gravesham's Local Plan First Review (1994) as well as Section 16 of the National Planning Policy Framework (2024).

Amenity

It is considered that the development will improve the amenity of the users of the recreation ground and in situ, would not harm the amenity of any neighbouring properties. As such the proposal complies with

CS19 (Development and Design Principles) of Gravesham's Local Plan Core Strategy (LPCS) (2014), along with Section 12 of the National Planning Policy Framework (NPPF) (2024).

Parking and Highways

Although the ramp access would be constructed across part of the hardstanding area, this is not considered to detrimentally impact the parking provision. As such, there are no concerns in terms of highways and parking.

Biodiversity

KCC Biodiversity have stated within their comments, set out above, that the development is subject to the 10% biodiversity net gain informative. To ensure biodiversity net gain is achieved, via the planting of two trees, a soft landscaping condition would need to be included on the decision notice, if planning permission were to be forthcoming.

The standard BNG informative will be included within the decision notice as required by central government.

Any Other Material Planning Considerations

Archaeology

The site lies within an area of multi-period archaeological potential. However, the development is unlikely to be impacted by this constraint.

Groundwater Protection Zone

The site is located within a Groundwater Protection Zone 3 area, however, the proposal would be unlikely to be impacted by this constraint.

Conclusion

The development is considered to be not inappropriate development in the green belt. Overall, the works would not result in a detrimental impact on the existing building, surrounding area or the conservation area itself. Furthermore, the development would have no adverse impact on the Kent Downs National Landscape or the Landscape Character Area. Moreover, the development protects the amenity of future users and neighbouring properties. The decision notice can include appropriate conditions to secure biodiversity net gain and the appropriate use of materials.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lucy Hankin	Team Leader:	Richard Hart
Signed:	L Hankin	Signed:	<i>R Hart</i>
Dated:	2 nd December 2025	Dated:	2nd April 2025