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Cascades Leisure Centre Planning Statement

Gravesham Borough Council

November 2022

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1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of the Communities Directorate of Gravesham Borough Council (GBC) to accompany a full planning application for the redevelopment of the Cascades Leisure Centre site in Gravesend.
- 1.2 The application seeks permission for:
- “Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the Site to provide a new leisure centre with community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking”.*
- 1.3 The application site is located at Cascades Leisure Centre, Thong Lane, Gravesend, DA12 4LG and involves the demolition of the existing Cascades Leisure Centre and public house (Regans Bar) and the development of a new build leisure centre (of a similar size to the existing).
- 1.4 The purpose of this Planning Statement is to assess the proposed development against relevant planning policies in the development plan, having regard to other relevant material planning considerations.

Scope of Application

- 1.5 The full planning application is accompanied by the following forms, drawings and documents alongside this Planning Statement:
- 1 Covering Letter;
 - 2 Completed Application Form and Ownership Certificate;
 - 3 Completed CIL Form;
 - 4 Site Location Plan;
 - 5 Application Drawings (full list appended to Covering Letter);
 - 6 Design and Access Statement, prepared by Space & Place Architects;
 - 7 Air Quality Assessment, prepared by Stantec;
 - 8 Arboricultural Impact Assessment, prepared by Lloyd Bore;
 - 9 Arboricultural Report, prepared by Lloyd Bore;
 - 10 Archaeological Assessment, prepared by Wessex Archaeology;
 - 11 Bat Survey Report, prepared by Lloyd Bore;
 - 12 Consultation Report, prepared by Knight, Kavanagh & Page Ltd;
 - 13 Construction Environment Management Plan, prepared by Tilbury Douglas Construction;
 - 14 Energy and Low Carbon Technology Statement, prepared by Desco;

- 15 Flood Risk Assessment and Drainage Strategy, prepared by Furness Partnership;
- 16 Landscape and Visual Impact Assessment, prepared by Colour;
- 17 Landscape Statement, prepared by Colour;
- 18 Lighting Strategy Report; prepared by Desco;
- 19 Noise Impact Assessment, prepared by Stantec;
- 20 Operational Waste Management Plan, prepared by Atkins;
- 21 Phase 1 Contamination Desk Study, prepared by Furness Partnership;
- 22 Preliminary Ecological Report, prepared by Lloyd Bore;
- 23 Structural Survey, prepared by Furness Partnership;
- 24 Transport Assessment, prepared by Stantec;
- 25 Travel Plan, prepared by Stantec;
- 26 Tree Protection Plan, prepared by Lloyd Bore;
- 27 Tree Survey Plan, prepared by Lloyd Bore;
- 28 Utilities Statement, prepared by Desco;
- 29 UXO Threat & Risk Assessment, prepared by Alpha Associates; and
- 30 Ventilation & Extraction Statement, prepared by Desco.

- 1.6 The scope of the planning application documents has been agreed with Officers at Gravesham Borough Council prior to submission of the application.

EIA Screening

- 1.7 A request for a screening opinion, in accordance with the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017, was submitted to the Council on the 14 November 2022. In a letter dated 30 November 2022, the Council confirmed that the proposed development does not constitute EIA development and therefore does not require an Environmental Statement.

Report Structure

- 1.8 The planning statement comprises the following sections:
- Section 2.0 refers to the background to the proposed development;
 - Section 3.0 provides a summary of pre-application consultation;
 - Section 4.0 sets out a description of the application Site and its surroundings;
 - Section 5.0 provides a summary of the proposals;
 - Section 6.0 sets out the planning policy relevant to the proposals;
 - Section 7.0 provides an assessment of the key planning considerations; and
 - Section 8.0 provides a conclusion to the statement.

2.0 Background

- 2.1 The existing Cascades Leisure Centre is owned by Gravesham Borough Council ('GBC'). GBC is looking to demolish the existing premises and provide a new replacement leisure centre, which better serves the needs of the local community.
- 2.2 The proposed redevelopment of this site draws on the Council's evidence base. GBC's Indoor and Built Facilities Needs Assessment (2016), which formed part of the Open Space, Sport and Recreation Assessment (2016), outlined that there is a need to consider the financial viability of the Council-owned Cascades and Cygnet leisure centres, given the likely increases in maintenance costs over coming years. The assessment advised that the potential for replacement with cost efficient, fit for purpose facilities, which reflect the changing demands of an ageing population, should be considered.
- 2.3 Based on the recommendations contained within this assessment, a feasibility study for the future provision of council owned leisure centres within the Borough was undertaken in 2021. The study investigated options for long term investment in the Cascades and Cygnet Leisure Centres, examining the potential for replacement of one or both facilities. The study recognised the complexities of redevelopment of the Cygnet Leisure Centre site, given that part of the physical building is owned by Kent County Council. The study therefore recommended replacing Cascades Leisure Centre, at its existing site, with a brand-new leisure centre.
- 2.4 It is within this context that GBC proposes to redevelop the existing Cascades Leisure Centre and provide new and enhanced facilities. The leisure centre building is dated and in poor condition, resulting in an inability to offer modern, flexible spaces for swimming, health and fitness.
- 2.5 GBC's Sport, Leisure & Active Recreation Strategy 2022-2027 outlines a number of key drivers and ambitions behind the redevelopment of the Cascades Leisure Centre, which include the following:
- Provide a swimming facility to meet the Borough's existing and future shortfall in provision;
 - Potential for co-location of health and wellbeing spaces;
 - Provide greater capacity to generate revenue with the offer of modern facilities;
 - Provide attractive facilities for users;
 - Achieve greater building efficiency to enable GBC to further deliver its ambition of net-zero operations by 2030; and
 - Provide Regional Level Competitive Sports and Leisure facilities.

3.0 Consultation and Engagement

- 3.1 This section provides an overview of the public engagement and consultation that has been undertaken by the Applicants in advance of this planning application submission. It also provides an overview of national and local policy in relation to community involvement in the planning system.

Planning Policy

National Planning Policy Framework (NPPF) (2021)

- 3.2 The NPPF identifies the role of local authorities in encourage the use of pre-application engagement. Paragraph 40 states that local authorities should “*encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications*”, where this would be beneficial.
- 3.3 Furthermore, paragraph 132 states that “*applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*”.

Local Planning Policy

- 3.4 In accordance with national planning policy, GBC has prepared a Statement of Community Involvement (SCI) (adopted October 2019).
- 3.5 The SCI sets out GBC’s policy for involving communities in the planning process. For major development proposals, the Council expects developers to meet the following publicity and consultation requirements as a minimum:
- Council’s website (21 days);
 - Press notice in local paper (21 days);
 - Site notice (21 days);
 - Serving notice by letter/e-mail to any adjoining owner/occupier (21 days);
 - Serving notice on Parish Council, in parished areas (21 days);
 - Serving notice on infrastructure manager, where site is within 10 metres of relevant railway land (21 days); and
 - Serving notice on statutory consultees in accordance with Schedule 4 to the 2015 Regulations (21 days).
- 3.6 The Council will consider wider publicity for major development applications on a case-by-case basis depending on the scale of the proposal, sensitivity of the Site and surroundings, and potential for impact.
- 3.7 The SCI encourages Applicants for major planning applications to undertake public pre-application consultation with potentially interested or affected parties, to help identify and resolve issues ahead of submission. The Council will seek to discuss the form of public consultation with the Applicant at pre-application stage. Whilst the extent of consultation

will be dependent on the particular circumstances of the proposal, the SCI specifies that early public consultation should be *“as open as possible and provide a genuine opportunity for the local community to influence the design and form of the development proposed”*.

3.8 The Council also advises engagement in paid pre-application advice services ahead of submission of major planning applications. It is outlined that these services can be very effective in identifying the likelihood of gaining permission at an early stage and avoid incurring unnecessary costs and delays.

3.9 GBC recognise the importance of engaging with the local community and other stakeholders in the Council’s decision-making processes. The Council is committed to ensuring that the community has the opportunity to participate effectively in the planning process.

Process of Engagement

3.10 A full summary of the engagement and consultation activity is detailed in the accompanying Statement of Community Involvement, prepared by KKP.

3.11 KKP undertook a feasibility study on the potential of a new single leisure centre to replace the Cascades and Cygnet leisure centres. As part of this study, KKP engaged with a wide range of consultees including:

- Local authority key officers (Leisure, Planning, Assets, etc.).
- County Council and Health partners (Public Health, Clinical Commissioning Group, Libraries etc.).
- Lower Thames Crossing project officers.
- National governing bodies of sport (e.g. Swim England, Badminton England etc.).
- Key stakeholders such as Gravesham Community Leisure Limited.
- Neighbouring authorities and the Ebbsfleet Garden City development.

3.12 The key outcome of the feasibility study and discussions with the above consultees was that the development of a replacement for the Cascades Leisure Centre needed to be considered within the same location, as there were no other available plots of land closer to Gravesend.

Pre-application Meetings

3.13 The proposed development has been the subject of an extensive pre-application design development process. A Planning Performance Agreement (‘PPA’) has been entered into by the Council and the Applicant. This provides a project management framework for handling the planning application from pre-application through to determination.

3.14 An initial pre-application meeting was held with officers on 6 July 2022. This was an initial concept meeting, to establish the principle of development prior to entering into detailed scheme discussions. Officers concluded that the proposal to replace the leisure centre was appropriate providing that it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. On this basis, it was agreed that a building similar in scale to the existing building would be acceptable.

- 3.15 Following the initial pre-application meeting, an initial scheme was worked up which positioned the building further south within the Site, parallel with the southern site boundary perimeter tree screen. The rationale at the time, and in advance of the ecological appraisal, tree and topographic surveys, was to use the area currently being used for informal kick about as the location for the proposed leisure centre.
- 3.16 The Preliminary Ecological Appraisal (PEA) and attendant Ecological Constraints Plan (ECP) by Lloyd Bore quantified the areas of greatest ecological value and reasoned a new approach to the building location that minimised impact on the wider site.
- 3.17 Consequentially the previous building location was discounted, and the design adjusted to reflect the new building location within the site.
- 3.18 A subsequent pre-application meeting was held on 15 November 2022. Officers were presented with detailed design proposals, as well as technical notes on Transport, Energy & Sustainability and landscaping proposals.
- 3.19 Officers were supportive of the scheme in principle, particularly of the final proposed location and orientation of the centre which sought to maintain the significant tree line through the centre of the site. Key feedback from officers included:
- Agreement of the view points and approach to the LVIA;
 - Discussion around the potential dual use of the proposed outdoor courts and over-flow parking;
 - Consider retention of elements of the existing play area; and
 - Confirmation that the scope of the transport assessment, travel plan and parking arrangements had been discussed and agreed in principle with KCC.

Public Consultation

Online

- 3.20 The public consultation exercise commenced on Monday 24 October 2022 and closed at midnight on Sunday 20 November 2022. However, additional responses were received through until midnight on Wednesday 23 November to allow for current members to respond to the survey.
- 3.21 The Applicant launched the consultation process via a range of media outlets on 24 October and created a bespoke web page to promote the development with an online survey. GBC's Communications Manager also assisted with regular social media activity to maintain the knowledge and interest in the consultation process with local residents. In addition, there was direct communication and sharing of consultation links with established groups and clubs in Gravesham.

In Person

- 3.22 In support of the online consultation survey, KKP and Space and Place Architects undertook a drop-in session at Cascades LC on Tuesday 8 November 2022, from 12 noon to 7pm.

3.23 The drop-in session provided residents with an opportunity to view the proposals for the replacement leisure centre and to ask any specific questions in relation to the development. In total there were circa 50 users of the facility who engaged with the drop-in session. The majority of these were interested in the mix of activity areas within the new centre and the location of the centre on the Site. Key areas of interest included:

- **Continuity of provision** - the current centre would only close when the new centre opens.
- **Swimming provision** - the retention of leisure features, but the ability to swim lengths and host competitions was seen as a positive.
- **Learn to swim** - a good quality pool to accommodate learn to swim sessions was welcomed.
- **Adventure play** - the provision of play facilities was seen as a positive.
- **Outdoor play** - improvements to the outdoor play area were viewed as really important for parents engaged in the consultation event.
- **Health suite** - there was some challenge about the provision of a health suite within the new facility.

Consultation Feedback

3.24 The online survey generated 695 responses which is a reasonable response for a localised consultation process for a local development and the general profile of respondents reflects the general profile of Gravesham. An overview of key findings from the survey is provided below:

- The Council has a clear public mandate to provide a modern replacement leisure facility in Gravesend.
- There is public consensus that this proposal is worthy of investing public funds to deliver.
- Respondents feel very positive about the proposal and the investment in facilities, but it will be important to ensure continuity for residents during the development period.
- In general there is agreement about the mix of facilities and activity areas proposed for the Site.
- There were no statistically significant responses for facilities that were identified as missing from the facility mix.
- It is clear from the responses that open space around the centre is high value. The priority areas for investment to improve the area include:
 - a Improved children's play facilities
 - b Walking routes and connections to existing rights of way
 - c Improved landscaping
 - d Sensory garden (quiet activity space)
 - e Cycling skills area

3.25 There were also a number of qualitative responses and additional comments provided within the survey responses that are worthy of note; however, none had statistically significant levels of response which required alteration to the direction of travel for the facility mix and wider development. These comments are provided below:

- The provision of a 50m pool for Kent
- The potential for an outdoor pool
- The provision of outdoor petanque facilities
- The need for facilities to be fully wheelchair user accessible.
- The provision of a health suite
- Concerns about the potential closure of Cygnet LC
- The retention of leisure water within the facility mix.
- The need to accommodate youths and young people at the new facility.
- The range of sports that can be accommodated at the new centre.
- The retention of the Site's heritage

3.26 The public consultation exercise reflects the open dialogue with residents on the new leisure centre. The project team has taken into account all of the comments received during the consultation process and whilst developing the detailed design for submission. The Applicant will continue to keep the local community informed of the progress of their plans, particularly to allay any fears about closures and to reassure residents that all users, especially those with disabilities, will be accommodated within the design of the new facility.

4.0 The Application Site and Context

The Application Site

- 4.1 The Site is located to the east of Gravesend and is approximately 4.5 ha in size.
- 4.2 The Site is currently in leisure use, consisting of a leisure centre (Class E(d)), with ancillary swimming pool, constructed in the late 1960s and early 1970s, with later additions to the building in the late 1980s. The Site also comprises of a public house (Sui Generis) with a residential unit above (Class C3), known as 'Regans Bar and Café', a car park with 183 parking spaces, a children's play area, a kick about field, 2 disused tennis courts, and other hardstanding areas.
- 4.3 It sits at 67m above sea level on a small flat plateau that previously served Gravesend Airport and latterly as RAF Gravesend.

Figure 4.1 Existing Site



Source: Google Earth

Site Access

- 4.4 Existing vehicular access and egress to the Site is provided from two points on Thong Lane, together forming a one-way route through the Site. Thong Lane connects to the A2 arterial road to the south and Gravesend to the north.

- 4.5 Gravesend railway station is approximately 5km from the Site (10 min journey by car), with services direct and high speed (HS1) services to London St Pancras International and other London stations. Two main bus routes (480 and 481) currently pass through the Site, connecting Riverview Park with Gravesend Town Centre and onwards to Northfleet, Swanscombe, Greenhithe, Stone, Bluewater Shopping Centre and Dartford Town Centre.
- 4.6 The National Cycle Network Route 1 passes close to the south bank of the River Thames through Gravesend Town Centre to the north of the Site whilst Route 177 passes parallel with the A2 arterial road to the south of the Site.

Local Plan and Other Site Designations

- 4.7 The Site sits on the Urban/Rural boundary. It is located within the Metropolitan Green Belt.
- 4.8 The entire site is located within Flood Zone 1 (Low Probability) on the Environment Agency (EA) Flood Map for Planning.
- 4.9 The Site is located within an Area of Archaeological Notification and is adjacent to, but not within, the Higham Arable Farmland Landscape Character Area. It is also within the SSSI Impact Risk Zone (IRZ) of the Shorne and Ashenbank Woods SSSI which is approximately 800m south of the Site and the risk zone of the Thames Estuary and Marshes Ramsar site, located 1,700m to the north.
- 4.10 The Site is not located within a Conservation Area, nor are there any listed or locally listed buildings on the site. The nearest listed buildings are the Grade II Listed Baynards Cottage and the Grade II Listed White Horse Cottage.

The Surrounding Area

- 4.11 The Site borders the Gravesend Model Marine and Engineering Society Ride (a model railway) and the Gravesend Golf Centre and to the north; the Legend Sports (Bar and Football/Tennis Court Hire) to the east; the Southern Valley Golf Club to the south; and Thong Lane to the west.
- 4.12 Beyond these sport and leisure uses immediately surrounding the site, the area comprises farmland and woodland to the north, east and south of the Site, with the next neighbouring village, Shorne, approximately one mile to the southeast.
- 4.13 Further north of the Site lies the village of Chalk, which adjoins the eastern edge of Gravesend. Immediately opposite the Site (on the western side of Thong Lane) is the Riverview Park neighbourhood of greater Gravesend which largely comprises detached and semi-detached residential properties of up to two storeys in height. Approximately 200m north of the Site are two residential properties (semi-detached) on the eastern side of Thong Lane.
- 4.14 The Site is approximately 2.5km inland of the southern bank of the River Thames, some 35 km from Central London (to the west); and is close to Tilbury on the northern bank of the River Thames in Essex.
- 4.15 The Lower Thames Crossing, a proposed road crossing of the Thames Estuary, is a designated Nationally Significant Infrastructure Project and subsequently a safe guarded

area is designated to the east of the Site. A Development Consent Order application has recently been submitted for the proposals.

Planning History

4.16

A summary of the relevant planning history for the site is set out below:

Table 4.1 Summary of relevant planning history

Application Ref.	Proposed Development	Decision	Decision Date
20130687	Application for the prior approval of the 15 metre high Elara column with antennas with shroud along with additional cabinets and ancillary development.	Prior approval not required	09/09/2013
20090517	Installation of six new windows, new window/door and new fire escape doors in south elevation and three new windows and external staircase on north elevation	Application permitted	03/09/2009
20080887	Construction of new steps, ramps and platforms to provide a level access and formation of new entrance and enclosed corridor.	Application withdrawn	08/10/2008
20050237	Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for erection of a 15 metre high mobile phone 'flagpole' incorporating three antenna and ancillary development.	Prior approval not required	22/04/2005
20050233	Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for the erection of a 15 metre high mobile phone 'flagpole', incorporating one antenna, radio equipment housing and ancillary development.	Prior approval not required	22/04/2005
19990757	Installation of a 15m high monopole supporting 3 no. sector antennae and 4 no. transmission dishes, erection of an equipment cabin, an electrical meter cabinet and relocation of palisade fence with access gates.	Prior approval not required	06/12/1999
19960364	Erection of 4 no. pole mounted floodlights, 12m high to illuminate the existing outdoor netball courts.	Application permitted	26/07/1996
19890978	Erection of 4 no. pole mounted floodlights 12m high to illuminate the existing tennis hard court area.	Application permitted	02/01/1990
19860844	Application under Regulation 4 of the Town and Country Planning General Regulations 1976 for construction of a leisure pool with ancillary accommodation formation of a new vehicular	Application permitted	15/12/1986

Application Ref.	Proposed Development	Decision	Decision Date
	access onto thong lane laying out of 174 car parking spaces 2 coach parking spaces and parking provision for motor cycles and disabled drivers.		
19860829	Change of use of the ground floor of detached two storey building from groundsman's store to bar with toilet accommodation, erection of single store side extension to form cafe, preparation room, store and yard; erection of a front entrance porch; repositioning of external staircase and laying out of a car parking for the existing first floor level self-contained flat.	Application permitted	20/11/1986
19770918	Erection of squash courts with training room	Application permitted	04/01/1978

Source: Gravesham Borough Council

4.17

The planning history above highlights the Council's support for the development of sports and health facilities within the Gravesham area.

5.0 **Proposed Development**

- 5.1 This section provides a description of the proposed development for which full planning permission is sought at the Cascades Leisure Centre site. A detailed description of the proposal is also set out in the accompanying Design and Access Statement.

Description of Development

- 5.2 Full planning permission is sought in relation to the following:

“Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the Site to provide a new leisure centre with community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking”.

- 5.3 The proposed development comprises the demolition of the existing leisure centre and public house to provide a new build leisure centre (of similar size to the existing) with a competition sized community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts. Externally, the scheme provides children’s play facilities, an active play activity area, an outdoor gym and trim trail and a recreational tennis & netball court. The scheme will provide 257 car parking spaces (15 will be accessible spaces and 25 will be EVCP), three coach drop off points, relocation of the existing bus stop, one new outdoor tennis / netball court.
- 5.4 The new leisure centre will be relocated onto the area currently used for visitor car parking. It is proposed the existing leisure centre will remain operational while the new facility is built and temporary car parking provided for centre users will be accommodated in the existing over-spill parking area owned by the council, directly adjacent to the Site to the north-west.

Land Uses and Floorspace

- 5.5 The proposed development comprises the following key elements:
- Development of 7,038 sqm (GIA) new leisure centre facility;
 - External facilities, comprising children’s play facilities, active play activity area, outdoor gym and trim trail, recreational tennis & netball court;
 - Retained access routes to Thong Lane;
 - 257 car parking spaces of which 15 are designated disabled spaces;
 - 23 electric vehicle charging points;
 - 35 cycle parking spaces;
 - 13 motorcycle spaces;
 - 3 coach parking bays;
 - Drop off zone; and

- Relocated existing bus stop.

Layout and Proposed Use

- 5.6 The proposed building sits set back from Thong Lane, sited amongst the surrounding trees and wider Green Belt environment.
- 5.7 The proposed development comprises the construction of a replacement leisure centre building with a unified footprint of 5,478 sq m and general height of 13.5m. The leisure centre building will be complemented by a proposed new car park, extended younger children's play area, older children's/adults' fitness zone, a fitness trail that wraps around the entire Site and new outdoor tennis/netball court.
- 5.8 The proposed centre will be located on the site of the existing car park that currently serves the existing facility. This location was selected due to its natural screening and minimal impact on existing trees and vegetation. In addition, this location allows the children's playground to be maintained, whilst facilitating continuity of sport and leisure provision during the construction phase of the development. Subject to approval, the existing Cascades Leisure Centre will only be demolished once the new centre is operational.

Design

Height and Scale

- 5.9 The proposed building has a maximum height of 13.5 metres. The scheme broadly comprises the following five volumes of varying scale:
- Pool hall;
 - Community facilities and fitness suite;
 - Sports hall;
 - Entrance hall; and
 - Interior volumes.
- 5.10 The proposed height sits below the existing trees, which are located adjacent to the southern elevation of the new leisure centre. As such the proposal will be largely screened from views along Thong Lane.
- 5.11 The height and scale have been informed by both the needs assessment undertaken by GBC in 2016, existing facilities within the current leisure centre and public consultation. An important element of the new leisure centre design has been to consolidate and improve the overall efficiencies of the centre not only to consolidate uses within the building and create a better overall experience, but also to significantly improve energy efficiency and reduce on-site energy consumption.
- 5.12 Overall, the replacement centre increases the proposed net floorspace by 5.45% on site (now up to 7,038 sqm GIA), whilst reducing the overall footprint of the leisure centre building.

Materials

- 5.13 Modern cladding materials are used, which are appropriate for the scale of the project proposed, whilst reflecting the wider landscape of the Greenbelt and the traditional Kentish farmstead architecture. The rationale for the colour and materials used in the scheme is based on the local vernacular.
- 5.14 A palette of greens, browns and greys has been used, with materials comprising cladding panels of varying tones and dark grey brick. Windows, curtain walling and external doors are all in an anthracite dark grey colour.
- 5.15 Full details on materials are provided in the accompanying Design and Access Statement.

Access and Servicing

Site Access

- 5.16 The existing entry and exist junctions on Thong Lane are to be retained, which provides vehicular, pedestrian and cycling access to the site. Within the site, pedestrian routes are provided to the main building and car parks through a network of footways. The majority are to be retained and improved as part of the landscaping solution for the site with new footway networks introduced throughout the site to give priority to the pedestrian.

Refuse

- 5.17 There will be a provision of 26 no. 1100 litre wheeled bins for general waste and recycling and 6 no. 240 litre bins for food waste.
- 5.18 The eventual building operator will facilitate all of these services on behalf of the Council. They would typically use a 6x4 26 tonne refuse collection vehicle to service these types of facilities.
- 5.19 There is a service layby situated to the rear of the leisure centre, which provides sufficient space to accommodate refuse collection and delivery vehicles. Access is available only for service vehicles who will then be able to make a left turn directly onto the one way system before exiting the site.

Parking

Car Parking

- 5.20 There is proposed parking provision of 257 spaces, of which 15 are designated disabled spaces, 14 are staff spaces and 25 are existing spaces located in the overspill car park. Additionally, 3 coach parking bays and 13 motorcycle spaces are to be provided.
- 5.21 The proposed development will provide 10% of spaces for active charging of electric vehicles, equating to a total of 23 spaces.
- 5.22 A dedicated vehicle drop-off bay is located close to the main entrance for assisted drop-off, taxi drop off, coach and minibus drop off.

Cycle Parking

- 5.23 The proposed development will provide a total of 35 cycle parking spaces. This will be covered and secure provision, situated within close proximity of the entrance of the new leisure centre.

Public Realm and Landscaping & Amenity Spaces

- 5.24 Extensive landscaping and tree planting will be provided to set the building in a quality setting and provide clear definition to the site.
- 5.25 The hard-surfaced car park will incorporate extensive areas of planting, composed of trees, hedges, shrubs and grass, which will make a positive contribution to the broader green infrastructure network of the site and surrounding area.
- 5.26 Existing trees are largely retained throughout. The exception relates to a small cluster of trees within the grounds of, or adjacent to, Regans Café & Bar area that fall within the footprint of the proposed building. Additionally, a small number of largely immature trees are lost within the proposed car park area.
- 5.27 With regard to boundary treatments, it is proposed to retain the existing southern site boundary, whilst providing a new fence on the site's northern boundary.

Lighting

- 5.28 External lighting is provided for the car park, pedestrian routes, building and walkway and the external games area. Full details are provided in the External Lighting Strategy Report.
- 5.29 Whilst floodlighting is indicated to the proposed recreational level tennis and netball court, detailed floodlighting proposals will not form a part of this application and it is anticipated that this would be entirely dealt with by condition (noting existing floodlight columns already exist in this location but not currently working (planning permission Ref. No: 19960364)).

Energy and Sustainability

- 5.30 The proposed leisure centre incorporates the following measures to secure a highly energy efficient building:
- Heating and cooling provided via heat recovery air source heat pumps;
 - Ventilation systems to incorporate high heat recovery;
 - Wastewater heat recovery system to reclaim heat from waste shower water;
 - Provision of Photovoltaic Panels on the roof;
 - Proposed building to be all electric, ensuring the building is carbon zero ready; and
 - Making best use of passive measures, such as maximising natural daylight and making use of thermal mass.
- 5.31 In order to achieve BREEAM 'excellent' standards of water efficiency, there will be careful selection of sanitaryware and flow restrictors will be considered if necessary.

Utilities

Gas

- 5.32 An enquiry has been made to Scotia Gas Networks (SGN) to discuss the provision of gas to the Site. The enquiry is for a new 1100kW gas supply to serve the new leisure centre as a backup to the primary heat generating plant and equipment.
- 5.33 The primary heat generating system is proposed to be a combination of air source heat pumps and water to water heat pumps.
- 5.34 The new gas installation is intended to provide redundancy for the primary heat generators only to enable the continued operation of the building in the event of plant failure or required maintenance.

Water

- 5.35 An enquiry has been made to Southern Water to discuss the provision of water to the site. The enquiry is for 7.22 litres per second as a peak demand flow rate and a new incoming water meter position for the building.
- 5.36 The new connected load is expected to be similar the existing.

Electricity

- 5.37 An enquiry has been made to UK Power Networks to discuss the provision of electricity to the site. The enquiry is for 800kVA as a maximum demand and a new sub-station dedicated to the new building.
- 5.38 Confirmation has been received that there is adequate capacity in the network and a point of connection identified on plan.
- 5.39 The sub-station serving the existing Cascades leisure centre will be de-commissioned once the new building is complete. The existing sub-station does not supply electricity to any adjacent properties.

Hours of Operation

- 5.40 The proposed opening hours of the leisure centre are as follows:
- Monday – Friday: 06:00 – 22:00; and
 - Saturday and Sunday: 07:00 – 21:30.

6.0 Planning Policy Context

- 6.1 The section of the report outlines national, strategic and local planning policy and guidance of relevance to the development. An assessment of the planning application against these policies is provided in Section 7.0.

Statutory Development Plan

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:
- 6.3 *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*
- 6.4 The relevant Statutory Development Plan for this project includes:
- 1 Gravesham Local Plan Core Strategy and Policies Map (2014); and
 - 2 Gravesham Local Plan First Review: Saved and Deleted Policies Version (September 2014).
- 6.5 Gravesham Borough Council has the following emerging planning policy:
- 1 Local Plan Core Strategy Partial Review and Site Allocations Document; and
 - 2 Development Management Policies Document.
- 6.6 The Council conducted the Regulation 18 (Stage 2) Consultation from October – December 2020. The Council are experiencing delays in progressing to the Regulation 19 Stage Consultation and there is uncertainty regarding the timescales going forward. Once there is greater certainty, the Council will update the Local Development Scheme (LDS) to provide the programme for the next stages of the Local Plan Review. The Council consider it unlikely that the updated LDS will be published before the end of 2022.

Gravesham Local Plan Core Strategy and Policies Map (2014)

- 6.7 **Policy CS01 (Sustainable Development)** states that the Council will take a positive approach to development that reflects the presumption in favour of Sustainable Development which is detailed within the National Planning Policy Framework.
- 6.8 **Policy CS02 (Scale and Distribution of Development)** states that in the rural area, development outside of defined settlements, will be supported where compatible with national policies to protect the Green Belt and local planning policy. It is recognised that as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area before the end of the plan period to meet the Borough's housing needs and sustain rural communities. The Green Belt has therefore been identified as a broad location for future growth and its boundaries will be subject to a review.
- 6.9 **Policy CS08 (Retail, Leisure and the Hierarchy of Centres)** outlines that the Council will seek to reinforce a sustainable network and hierarchy of centres by maintaining the sub-regional role of Gravesend Town Centre; protecting and enhancing existing local centres and creating additional local centres to meet local retail needs. Proposals for leisure,

entertainment facilities and the more intensive sport and recreation uses outside the Town Centre, exceeding 2,500 sq m floorspace, will be subject to an impact assessment in accordance with national policy.

- 6.10 **Policy CS10 (Physical and Social Infrastructure)** outlines the Council's support for proposals that protect, retain, or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.
- 6.11 **Policy CS11 (Transport)** states that new development should mitigate impacts on highways and public transport networks. Transport assessments and travel plans are required where appropriate, produced in accordance with national and local policy guidance. Parking in new development is required in accordance with adopted parking standards.
- 6.12 **Policy CS12 (Green Infrastructure)** outlines that sites designated for their biodiversity value will be protected. The Council will not permit a net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create, and maintain habitats will be sought. Where a negative impact on protected or priority habitats/species cannot be avoided and the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.
- 6.13 **Policy CS13 (Green Space, Sport and Recreation)** states that the Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.
- 6.14 **Policy CS18 (Climate Change)** requires new development to minimise the impact of drainage on wastewater systems. The Council requires that surface water run-off from new development must not have greater adverse impact than the existing use. SuDS are required on all development where technically and financially feasible. All non-residential developments of 1,000 sqm or more must meet the BREEAM "excellent" standards of water efficiency and include provision for the collection of rainwater. The Council will support proposals which lead to a reduction in carbon footprint.
- 6.15 **Policy CS19 (Development and Design Principles)** requires new development to be visually attractive, fit for purpose and locally distinctive. Proposals must 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 and construction of new development must incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.
- 6.16 **Policy CS20 (Heritage and the Historic Environment)** requires proposals to preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. When considering the impact of a proposed development on a designated heritage asset, the

weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset.

Gravesham Local Plan First Review: Saved and Deleted Policies Version (September 2014)

- 6.17 **Policy P3 (Vehicle Parking Standards)** outlines that parking should be provided in accordance with the Kent County Council Vehicle Parking Standards, unless justified as an exception. All vehicle parking provision should normally be made on the development site.
- 6.18 **Policy T1 (Impact of Development on the Highway Network)** states that the impact on traffic and the transport system will be considered to ensure that all proposed developments are adequately served by the highway network.

Emerging Planning Policy

Development Management Policies Document

- 6.19 **Policy GB 5 (Extensions, Replacement Buildings and Ancillary Development in the Green Belt)** states that replacement buildings in the Green Belt must be in the same use and not result in a materially larger building, unless justified by very special circumstances that clearly outweigh harm to the Green Belt and any other harm. Footprint, floorspace, volume, height, scale and massing, in contrast with the existing building, will all be accounted for when determining if the building is materially larger. Core Strategy Policy CS19 will apply in determining whether the design of any proposed replacement building is appropriate, having regard to the presence of existing development on the site, prominence, visual impact, and whether the building could be relocated within the site to have less impact on the Green Belt.
- 6.20 **Policy RE 5 (Retention of Public Houses)** outlines that the loss of an existing public house will only be permitted where it is demonstrated to no longer be economically viable and there is 12 months' marketing evidence.
- 6.21 In considering a proposal that would result in the loss of a public house, the Council will also account for:
- The role in the provision of space for community groups to meet;
 - The design, character and heritage value of the public house;
 - The ability of the building to accommodate an alternative use without need for demolition;
 - The appropriateness of the proposed alternative use to the location of the site and neighbouring uses; and
 - Whether the proposed use provides an alternative community service or function.
- 6.22 **Policy INF 3 (Understanding and Mitigating Transport Impacts)** outlines that applications should be supported by a proportionate evidence base detailing baseline and future transport conditions and the likely impact of the proposed development. Large proposals should be supported by a formal Transport Assessment and may require the

production of a Travel Plan. Parking is required in accordance with the Council's adopted parking standards.

- 6.23 **Policy INF 5 (Electric Vehicle Charging Points)** states that where viable, all new developments are required to provide EV charging infrastructure. For development <50 bays, it is required to provide a single parking bay and charging point market out for use by EVs only. For development >50 bays, 10% of bays are required to be market out for EV use only with charging points.

Other Material Considerations

NPPF (2021)

- 6.24 The National Planning Policy Framework (2021) forms a material consideration in the assessment of the proposed development.
- 6.25 The National Planning Policy Framework (NPPF), published in July 2021, sets out national planning policy, providing strategic direction on a wide range of planning matters. It is supplemented by Planning Practice Guidance which further advises on how policy should be interpreted.
- 6.26 The NPPF states that the purpose of the planning system is '*to contribute to the achievement of sustainable development*' (paragraph 7). Paragraph 8 sets out how policy should be interpreted.
- 'Economic' in contributing to a strong and competitive;
 - 'Social' in supporting strong communities; and
 - 'Environmental' in protecting and enhancing the environment.
- 6.27 Under the NPPF it is incumbent upon decision-making authorities to support applications for sustainable development wherever possible and without delay, particularly where that development will help meet the challenges of economic growth and housing needs.
- 6.28 Paragraph 10 establishes a presumption in favour of sustainable development. Paragraph 11 states that for decision-taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent, or relevant policies are out-of-date, granting planning permission unless:
- The application of policies within the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.29 Paragraph 81 supports decisions and policies that help create conditions in which businesses can invest, expand, and adapt, placing significant weight on the need to support economic growth and productivity. Paragraph 83 identifies the requirement for planning decisions to make provision for clusters or networks of industries.

- 6.30 Good design is identified as a key aspect of sustainable development (paragraph 126), and developments should add to the overall quality of the area, adopt appropriate and effective landscaping and be sympathetic to its setting (paragraph 130).
- 6.31 Section 13 of the NPPF provides guidance on protecting Green Belt land. Paragraph 138 sets out the five purposes of the Green Belt. In terms of proposals which affect the Green Belt, Paragraph 147 states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*.
- 6.32 It states *“when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘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”* (para. 148).
- 6.33 Paragraph 149 states that the construction of new buildings is inappropriate in the Green Belt but sets out a list of exceptions. Part d) outlines an exception to be *“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces”*.
- 6.34 Part g) outlines a further exception to be *“limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

Not have a greater impact on the openness of the Green Belt than the existing development;

or

Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

Sport England Playing Fields Policy and Guidance (2018)

- 6.35 To help protect the spaces where people get active, local planning authorities are required by law to consult Sport England on planning applications they receive which affect playing fields. Sport England’s Playing Field Policy helps LPAs to assess and respond to these applications. Sport England also provides publicly available guidance alongside its Playing Fields Policy to give clarity and advice to external parties on how we make individual assessments.
- 6.36 As the proposed development at Cascades LC includes impact on tennis/netball court provision, which was previously in use, circa 20 years ago, it is understood that GBC Planning Officers will engage with Sport England as a statutory or non-statutory consultee. As such we have provided context and rationale for the development within the context of the Playing Field Policy exceptions:
- **Exception 1 (E1): Excess of provision** - a robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

- **Exception 2 (E2): Ancillary development** - the proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- **Exception 3 (E3): Land incapable of forming part of a pitch** - the proposed development affects only land incapable of forming part of a playing pitch and does not:
 - a reduce the size of any playing pitch;
 - b result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - c reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - d result in the loss of other sporting provision or ancillary facilities on the site; or
 - e prejudice the use of any remaining areas of playing field on the site.
- **Exception 4 (E4): Replacement provision of equivalent or better quality and quantity** - the area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
 - a of equivalent or better quality, and
 - b of equivalent or greater quantity, and
 - c in a suitable location, and
 - d subject to equivalent or better accessibility and management arrangements.
- **Exception 5 (E5): New sports provision benefit outweighs the loss of the playing field** - the proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

GBC Playing Pitch Strategy (2016)

- 6.37 The GBC Playing Pitch Strategy provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2016 and 2028.
- 6.38 The strategy identifies Cascades Leisure Centre as one of the 10 overarching priority sites in their hierarchy of provision in terms of the management and improvement of sites.

GBC Sports Leisure Strategy (2022-2027)

- 6.39 The GBC Sports, Leisure and Active Recreation Strategy has been prepared to outline a number of key priorities and actions which provide a framework for improving and enhancing leisure services within the Borough. The strategy commits to the following:

“The delivery of new sports and leisure sites that include, the new Cascades Leisure Centre...”

- 6.40 It also recognises that alternative sites for leisure centre development in the borough are extremely limited and consequently, Cascades Leisure Centre's existing car park has been appraised as the highest ranked site for development, given that it is in Council ownership, has the potential to create good visibility and a site frontage for a new leisure centre.

Supplementary Planning Documents

Gravesham Landscape Character Assessment (2009)

- 6.41 GBC's Landscape Character Assessment was adopted in May 2009. The assessment identifies the local landscape character across the Borough and provide guidelines for appropriate actions to protect and enhance the landscape.

KCC Guide to Development Contributions and the Provision of Community Infrastructure (2007)

- 6.42 KCC's Guide to Development Contributions and the Provision of Community Infrastructure was published in March 2007. This guide sets out the standard requirements and methodologies employed in the calculations of development contributions. This will therefore raise awareness at an early stage in the development process of the potential requirements, allowing applicants to account for these matters in the formulation of development proposals and costs.

Supplementary Planning Guidance SPG1 – Landscape Character (2006)

- 6.43 KCC's Landscape Character SPG was adopted in July 2006 to supplement the policies of adopted development plans. The guidance provides an overview of the various threats to Kent's landscape character and lists opportunities whereby development can enhance landscape character.

Supplementary Planning Guidance SPG2 – Biodiversity Conservation (2006)

- 6.44 KCC's Biodiversity Conservation SPG was adopted in July 2005, having been developed in partnership with members of the Kent Biodiversity Partnership. The SPG provides an introduction to biodiversity conservation and an overview of its importance. The guidance offers a summary of how biodiversity conservation should be considered throughout the development process, and the tools available to assist with this.

Supplementary Planning Guidance SPG4 – Kent Parking Standards (2006)

- 6.45 KCC's Parking Standards were adopted in July 2006, aiming to provide a consistent approach to parking provision. Developers are required to provide parking spaces for the mobility impaired and for spaces for convenient and safe cycle parking. Parking standards are provided for each land use classification.

7.0 Planning Assessment

7.1 This section of the report provides a comprehensive assessment of the development proposals for Cascades Leisure Centres. The key planning issues on which the determination of the application will be based are as follows:

- 1 Principle of Proposed Use/Green Belt Assessment;
- 2 Design;
- 3 Transport;
- 4 Flood Risk;
- 5 Energy and Sustainability; and
- 6 Other Environmental Issues.

7.2 These issues form the basis of our assessment below.

Principle of Proposed Use

7.3 Directing new development to previously developed land is a principle promoted in national, regional and local policy. The proposed development seeks to provide a replacement multi-functional leisure facility with a new competition sized swimming pool, six court sports hall, fitness suite, squash courts and fitness studios. The building is proposed as being located on the site of the existing car parking area, making use of previously developed land in accordance with paragraph 119 of the NPPF.

7.4 The Applicant is prioritising the replacement and improvement of the facility in accordance with the GBC Sports Leisure Strategy 2022-2027 and has worked closely with stakeholders and the community during the pre-application stage to understand what local people would like to see from the new Leisure Centre. The proposed development presents an opportunity to provide a better facility in terms of quantity and quality of community and sporting facilities in a sustainable and accessible location.

7.5 The principle of use is established by the historic use of the Site as a leisure centre. Further to this, the principle of demolishing the existing centre and rebuilding it on the same site is supported in principle by Policy CS13 of the Gravesham Local Plan Core Strategy (2014) which states that the Council will seek to enhance the quality and accessibility of sports facilities.

7.6 The Site is in a highly sustainable location, given its position on previously developed land on the eastern edge of Gravesend Town Centre. The facility will make the best use of existing land and provide an uplift (5%) of leisure floorspace in a location where ease of walking, cycling and public transport modes makes the Site easily accessible to both local residents and visitors. The facility has the potential to improve health and social outcomes for locals by way of provision of a range of high quality leisure and community facilities.

7.7 The proposed development will also provide both direct and indirect economic benefits to the area. Sport, leisure, recreation and culture are all important economic drivers. In 2010, sport and sport-related activity contributed £20.3 billion to the English economy; 1.9% of the England total. The contribution to employment is even greater with sport and sport-

related activity estimated to support over 400,000 full-time equivalent jobs, 2.3% of all jobs in England. The new centre will create additional employment in the form of both skilled and unskilled jobs and will also create stimulus in the local supply chain through additional demand.

- 7.8 It is therefore considered that the proposed development would be acceptable in principle. This has also been supported by Officers following pre-application discussions. It accords with Policy CS14 of the Gravesham Local Plan and the new leisure centre will ensure an increase in provision and improved leisure facilities in the place of the former Cascades Leisure Centre to meet the requirements of paragraph 99 of the NPPF. Notwithstanding this, given the Site's location within the Green Belt, the proposed development is required to comply with national policies for protecting the Green Belt.

Development in the Green Belt

- 7.9 The Site is within the Green Belt. The National Planning Policy Framework ('NPPF') paragraph 147 states that *"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances"*.
- 7.10 Paragraph 149 goes on to state that the construction of new buildings in the Green Belt should be regarded as inappropriate, however sets out a number of exemptions where development in the Green Belt is not inappropriate. The development has been designed as a replacement building, as well as a redevelopment of previously developed land in accordance with NPPF paragraph 149, part d) and part g).
- 7.11 Paragraph 149, part d) states:
- "d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces"*
- 7.12 Whilst there is no definitive legal definition of 'materially larger', it is generally accepted that this means the building should be similar in overall footprint and height, with some case law demonstrating that buildings up to 30% larger have been considered to be 'not materially larger'.
- 7.13 The proposed building is similar in scale (with an uplift of 5% in GIA floorspace) to the existing leisure centre and is proposed as being two storeys, as per the existing. In terms of typical floor area, the proposed development accommodates a much smaller site/area base than the existing leisure centre, resulting in a reduced building footprint but with a slight increase in net internal area. The proposed building therefore represents a much more efficient use of space, which in turn allows for a more energy efficient building.
- 7.14 Subsequently, it is considered that the proposed building is not materially larger than the building it replaces and accordingly, having regard to paragraph 149(d), the proposals can be identified as not inappropriate development.
- 7.15 Paragraph 149, part g) states:
- "g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

Not have a greater impact on the openness of the Green Belt than the existing development;

or

Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

- 7.16 ‘Previously developed land’ is defined in the glossary of the NPPF as “*land which is or was occupied by a permanent structure, including the curtilage of developed land*”. It excludes land that is occupied by agricultural buildings. The existing building is used as a leisure centre, including a swimming pool, fitness suite and other fitness studios. The site also comprises a public house (Regans Bar) with a 3 bedroom flat above.
- 7.17 It is clear that the existing buildings on the Site are not in agricultural use. As such, the Site constitutes ‘previously developed land’ as defined in the NPPF.
- 7.18 As the site is previously developed land, development is not inappropriate provided it preserves the openness of the Green Belt.
- 7.19 ‘Openness’ is a broad policy concept and assessing the impact of a development on openness requires a planning judgement based on the circumstances of the case. Planning Practice Guidance confirms the following matters which may need to be taken into account in assessing openness:
- *“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; and*
 - *the degree of activity likely to be generated, such as traffic generation” (paragraph: 001 reference ID: 64-001-20190722).*
- 7.20 We consider the proposed development on openness below, with consideration given to the three aspects noted above.

1. Visual and Spatial Aspects

- 7.21 Visual impact is a relevant factor when considering the question of openness of the Green Belt. Visual amenity is one of the beneficial uses of the Green Belt. This is amenity enjoyed by others who might view and area of Green Belt from public places.
- 7.22 The topography of the surrounding context of the Site is heavily influenced by the path of the River Thames, the estuary of which runs west to east, c.2.5km north of the Site. The Site itself sits on a plateau of relatively high ground at 65.5m AOD. The northern ridge of the plateau, located approximately 500m from the Site gradually falls to the Thames Estuary c. 2km further north. The plateau extends c.850m to the east before forming a shallow valley and rising again to the village of Shorne, situated c.900m to the east.
- 7.23 Within the Site, there are many mature trees which line both the access road and boundary with Thong Lane, and which form woodland blocks along the Site’s south-eastern boundary

and on an engineered earth mound immediately south of the main car park. Blocks of woodland also extend around the football pitches, northern reaches of the redundant golf course, and driving golf range. These trees provide significant screening to the Site from the landscape beyond.

- 7.24 The proposed development is a redevelopment of the existing leisure centre, with a reduced built footprint. The height of the proposed building is 0.85m taller than the existing building, which is a negligible difference in terms of visual impact. The proposed leisure centre site is 80m south of the existing, whilst the proposed associated car parking area is located on the site of the existing leisure centre.
- 7.25 Landscape effects caused by the proposed development are limited to landscape character and to the Green Belt designation, both of which are assessed as experiencing a negligible effect. The limited landscape impact is a function of the net limited change that the proposed development constitutes. The proposals retain the Site's overall character as a leisure facility and seek to improve the facility by consolidating the existing functions of Site.
- 7.26 The proposed development will be more efficiently organised and its overall architectural and landscape character will be of a higher quality than that of the existing Site and building arrangements. The proposed building will be taller and closer to the south-eastern boundary than is currently the case, with a marginally greater visibility within off-site areas to the south. However, this imposes only negligible effects on the immediate local character area and Green Belt. Overall, the landscape designations and landscape character will be maintained.
- 7.27 Visual effects resulting from the proposed development are very limited, largely due to the inherent screening ability of mature trees within and around the Site. The most significant visual effects are experienced at close range at the Site's southern entrance on Thong Lane, which provides direct views along the access road towards the proposed building, located on the existing car park. The resulting visual effects are significant but considered positive as they fit sympathetically with the urban context of this portion of Thong Lane, as well as addressing broader issues relating to site legibility and safety.
- 7.28 Viewpoints south of the Site, which tend to afford glimpsed oblique towards the existing leisure centre, will register the slight increase in building height as the proposed building appears through the gap in the tall trees on the south-eastern boundary of the Site. However, most of the building will be screened and visible parts will be set no higher than the canopies of most adjacent trees. The visual effect will be further mitigated by the design of the building facades, the colour and materiality of which will be sympathetic to the surrounding vegetation and character of the nearby rural landscape.
- 7.29 Distant views of the proposed building are limited due to the screening effects of intervening topography, woodland cover, hedgerows and buildings. Only the discerning eye will be able to pick out the roof line of the proposed building which will, otherwise, be well-screened by the adjacent belt of boundary trees. The proposed building will be seen in the broader context of the various, somewhat disparate, features that comprise Thames Estuary landscape.

- 7.30 It is therefore concluded that there will be no greater visual or spatial impact on the openness of the Green Belt as a result of the proposals.

2. Duration

- 7.31 The second aspect of openness is duration. The proposed leisure centre will be permanent. It replaces the existing Cascades Leisure Centre and would not therefore cause greater impact on the openness. The existing leisure centre was built in the late 1960s and has therefore been a part of the landscape for a significant period of time. If there was not development scheme for the site, the existing building could be maintained in its current form for many years.

3. Levels of Activity

- 7.32 The impact of a development of the openness of the Green Belt can also be considered in terms of the levels of activity of a development. The Transport Statement, prepared by Stantec, assumes that the proposed development would result in a 12.4% increase in traffic generation as a result of the increased floorspace. This translates to an increase of one additional vehicle every 10 minute and 2 minutes during the morning and evening peak hours respectively. This demonstrates that the proposed development would not give rise to a significant increase in vehicle movements to and from the Site which could harm the perception of the openness of the Green Belt.
- 7.33 Overall, the above demonstrates that the development fully meets the requirements of paragraph 149, part d) and part g) of the NPPF and is not inappropriate development within the Green Belt.

Loss of Sports Facilities

- 7.34 Immediately west of the existing leisure centre are 2 no. disused tennis/netball courts. These have not been used for over 20 years and have not been identified by England Netball and the Lawn Tennis Association as existing resource within the Council's Playing Pitch Strategy. The existing 2 no. tennis/netball courts are to be replaced with 1 no. new multi-use enclosed outdoor tennis and netball court and an overspill car parking area, thus resulting in the loss of 1 no. outdoor court.
- 7.35 The existing leisure centre also accommodates 6 no. squash courts, however only half of these are currently in use, the remaining courts have been converted into a spin studio, fitness studio and the remainder used for general storage. The proposed development will provide 2 no. squash courts and therefore it is acknowledged that this will constitute a loss of 1 no. squash court (considering three of the existing provision are not currently in use).
- 7.36 The facility mix comparison for the current and proposed leisure centre is detailed below:

Table 7.1 Facility Comparison

Current Facility Mix	Proposed Facility Mix
Leisure Pool	8 lane 25m Pool
3-court Sports Hall	Teaching Pool
Fitness Suite	Leisure water and confidence area
Studios	6-court Sports Hall

Current Facility Mix	Proposed Facility Mix
6 no. squash courts (however only 3 no. operational)	2 no. squash courts
Health Suite	Adventure play facility
Health Partner Provision	Fitness suite
2 no. tennis/netball courts	Studios
	Health Partner Provision
	Community Spaces
	1 no. tennis/netball court

7.37 It is clear from the above that the new facility will offer a wider range of activity spaces which offer significant betterment for local residents, including:

- A separate teaching pool;
- 25m competition swimming pool with spectator provision;
- Larger fitness suite;
- Larger sports hall and ability to accommodate events;
- Bigger, and more advanced, group exercise studios;
- Children's indoor adventure play area;
- Community health and meeting spaces;
- Improved catering/café facilities;
- Improved outdoor spaces including cycle skills area, improved children's play facility, improved links to existing walking routes, improved landscaping and sensory garden.

7.38 Whilst it is recognised that there is a loss of provision in terms of the 1 no. tennis court and 1 no. squash court, given the additional indoor provision being delivered (i.e. additional swimming pools, as well as the increased size of the sports hall) and improvements to the quality and functionality of the outdoor spaces (to accommodate an identified local need for netball courts) it is considered that this is sufficient additional provision to warrant an exception under E5 of Sport England's Playing Fields Policy and Guidance (2018). In addition to this, the development of the facility recognises the aspirations within 'Uniting the Movement' (Sport England's Strategy) and has clearly identified the benefits of physical activity within a formal and informal setting through the range of outdoor improvements to the scheme.

Loss of Public House and Residential Accommodation

7.39 The proposals comprise the demolition of all existing buildings on the Site, include 'Regan's Bar and Café' (Sui Generis), a public house located south of the existing leisure centre, adjacent to the existing car parking area. Above the public house is a three bedroom flat used in connection with the pub.

7.40 Paragraph 84 (d) of the NPPF states that planning policies and decisions should enable the retention and development of accessible local services and community facilities such as local shops, meeting places, sports venues, open space, cultural building, public houses and places of worship.

- 7.41 At a local level, there is no policy within Gravesham's Core Strategy which restricts the demolition or redevelopment of a public house or the loss of one residential unit.
- 7.42 The public house is run-down and underutilised. Its demolition, as well as the demolition of the residential unit above is required to facilitate the location of the new leisure centre building on a previously developed part of the site (the existing car parking area) and thus reducing the impact on visual amenity and openness. As highlighted above, it is considered that the proposed development would bring very significant health and wellbeing improvements and net additional public benefits to the community in the form of new community spaces and leisure facilities, a higher quality and accessible landscape design including usable spaces which are flexible in function and biodiversity enhancement.
- 7.43 These significant benefits are considered to outweigh the loss of the public house and associated residential unit. It is also worth noting that there are two other public houses (the Gravesend Boat and the Viewpoint Club), approximately 600m to the east and 500m to the north of the Site, and therefore no shortage of this type of provision in the community.

Design

- 7.44 Policy at all levels requires high quality design. Paragraph 124 of the NPPF sets out that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. 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.
- 7.45 Policy CS19 of the Core Strategy requires new development to be visually attractive, fit for purpose and locally distinctive. Proposals must 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.
- 7.46 A detailed Design and Access Statement (DAS), prepared by Space & Place, accompanies this application. The DAS details how the proposed development has been considered against the relevant design-focused policies and provides an attractive and highly functional scheme.

Layout and Legibility

- 7.47 Policy CS19 states that new development should be designed to be inclusive for all members of the community, create a safe and secure environment, and build in resilience to the effects of climate change. New development should be designed and located to safeguard the amenity both of occupants and of neighbouring properties and land.
- 7.48 As highlighted in Section 3.0, the leisure centre was previously proposed as being located further south within the Site, parallel with the southern site boundary perimeter tree screen. Following the undertaking of the Preliminary Ecological Appraisal (PEA) and preparation of the Ecological Constraints Plan, it was reasoned that a new approach was required to the building location, to allow for the retention of as many trees as possible and minimise the impact on the wider site.

- 7.49 Consequentially, it is proposed that the new leisure centre facility is sited on the car park that currently serves the existing facility. This location was deemed to have a 'low ecological value' and was also selected due to its natural screening and minimal impact on existing trees and vegetation, as well as occupying a previously developed part of the Site. This siting ensures the building is located as far as is possible from the adjacent dwellings on Thong Lane. In addition, this location allows the children's playground to be maintained, whilst facilitating continuity of sport and leisure provision during the construction phase of the development. Subject to approval, the existing Cascades Leisure Centre will only be demolished once the new centre is operational.
- 7.50 The main entrance provides a generous canopy and landscaping approach, designed to provide clear legibility. There is entrance signage, a wide lobby and generous circulation made visible by a clear unobstructed and open paved area immediately to the front. The scheme has a legible internal arrangement with clear internal public circulation to provide an unambiguous route to all activities. The proposal provides a number of active frontages, with large windows on the fitness suite and pool hall to give a clear idea of internal use.
- 7.51 Inclusivity is at the centre of the design of this scheme, having been considered in terms of access, changing areas, and use of the facility. Full details are provided in the accompanying DAS.

Scale, Height and Massing

- 7.52 Policy CS19 requires that new development integrates well with the surrounding local area and accounts for the scale and height of adjoining buildings.
- 7.53 The proposal was designed to ensure that there is limited additional impact derived from the height of the proposal. The proposed height of the scheme was informed by the height of the existing facility and the established domestic scale of the adjacent Riverview Estate, ensuring that the scale is in-keeping with this setting. It is noted that the height sits below the existing trees, which ensures that the proposed leisure centre will be largely screened from views along Thong Lane.
- 7.54 The scale, height and massing of the proposal has been designed to integrate with its setting and ensure the scale is suitable with regard to nearby dwellings. It is therefore considered that the relevant requirements of Policy CS19 have been met.

Landscape and Visual Impact

- 7.55 Policy CS19 details that in their assessment of proposals, the Council will account for the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value, which contribute to local character and sense of place.
- 7.56 This application is accompanied by a detailed Landscape and Visual Impact Assessment (LVIA), prepared by Colour.
- 7.57 The LVIA outlines that landscape and visual effects will derive from the increased visibility of the proposed building, generated by the position of the proposed building within the Site together with its increase in height, relative to baseline conditions.

- 7.58 To mitigate any residual landscape and visual effects, the proposed building has been designed to ensure its facades fit sympathetically within the context of the surrounding mature trees and the rural landscape beyond. Additional tree planting will be included within the proposed car park, situated on the northern side of the proposed building, to mitigate the removal of a small proportion of trees that will be lost to construction, and to visually soften the proposed built form.
- 7.59 The LVIA concludes that overall, the proposed development will have negligible effects on the Green Belt and the local character of the surrounding area. On this basis, it is considered that the proposal complies with the relevant part of Policy CS19.

Lighting

- 7.60 Policy CS19 of the Core Strategy requires that new development avoids adverse environmental impacts arising from light pollution.
- 7.61 An External Lighting Strategy Report has been prepared by Desco to accompany this application. This report reviews the potential implications of the external lighting scheme within the confines of the development site.
- 7.62 As outlined in the Bat Survey Report, the site is used for foraging by common pipistrelle bats. The report suggests key guidelines for the proposed roadway access, car park and amenity lighting installation to inform the formulation of lighting schemes and ensure the impact on ecology is minimised.
- 7.63 The report overall concludes that the lighting strategy is efficient in use, sensitive to planning considerations and does not impact adversely on-site ecology. This will be achieved through the careful selection of all elements of the lighting installation, including light sources, luminaire types, optical attachment and control strategy. On this basis, it is considered that the requirements of Policy CS19 with regard to lighting have been met.

Transport

- 7.64 Policy CS11 of Gravesham's Core Strategy requires that new development should mitigate impacts on highways and public transport networks. Transport Assessments and Travel Plans are required where appropriate. This is supported by Policy T1 of the saved policies, which requires the consideration of the impact of development on the highway network. Policy P3 of the Saved Policies requires parking to be provided in accordance with the Kent County Council Vehicle Parking Standards.
- 7.65 In line with Policy CS11, a Transport Assessment has been prepared by Stantec to accompany this application, providing an assessment of the highway aspects of the proposed development. The various transport considerations are summarised below.

Sustainable Travel

- 7.66 The site has a good level of pedestrian connectivity, being well served by footways and Public Rights of Way, which connect the site with its surroundings. There are no designated or segregated cycle routes within the immediate site vicinity, meaning cyclists share the carriageway with general traffic. However, the traffic calming on Thong Lane encourages lower traffic speeds compatible with cycling.

- 7.67 Cascades Leisure Centre provides a bus stop within the site, which will be retained within the new masterplan. Bus services provide direct access to the leisure centre from Gravesend town centre and the surroundings. There are additional bus stops situated nearby to the site. Gravesend Railway Station is situated 4.5 kilometres from the site and is accessible by bus.

Access

- 7.68 The existing entry and exist junctions on Thong Lane are to be retained, which provides vehicular, pedestrian and cycling access to the site. Within the site, pedestrian routes are provided to the main building and car parks through a network of footways.

Vehicle Trips

- 7.69 The predicted traffic flows from the proposed development have been calculated based on traffic generation associated with the existing leisure centre. Given the increase in floor area proposed, it is estimated that the traffic generation will increase.
- 7.70 It is noted that during the morning peak hour the increase in traffic flow is predicted to be 6 vehicles (2 way) whilst during the evening peak hour it is 29 vehicles. This represents an increase of one additional vehicle every 10 minutes and 2 minutes during the morning and evening peak hours respectively. This volume of traffic is unlikely to be perceptible in practise.

Car Parking

- 7.71 There are currently 183 car parking spaces provided on site, including 6 disabled spaces.
- 7.72 Given the increase in floor space, it is proposed to increase the parking provision to a total of 257 spaces, of which 15 are designated disabled spaces, alongside 13 motorcycle spaces. The provision of car parking 257 spaces falls within the maximum of 357 permitted by the KCC parking standards. On this basis, it is considered that the proposed development meets KCC vehicle parking standards.
- 7.73 3 coach parking bays are proposed. It is also proposed to provide an area of overflow parking, located on the site of 2 redundant tennis courts. This will accommodate visitors on competition days when there is anticipated to be a large number of spectators visiting the site.

EV Charging

- 7.74 The proposed development will provide 10% of spaces for active charging of electric vehicles, equating to a total of 23 spaces. This exceeds the existing requirement outlined by KCC and accords with the emerging GBC policy relating to active charging.

Cycle Parking

- 7.75 The proposed development will provide a total of 35 cycle parking spaces, which accords with KCC's non-residential parking standards contained in Supplementary Planning Guidance 4 (SPG4).

Waste Storage and Servicing

- 7.76 There will be on site delivery and refuse collection movements associated with the proposed development as for the existing uses on site. The general layout shows a service area with sufficient space to accommodate refuse collection and delivery vehicles. Vehicle swept path analysis has been undertaken for refuse vehicles entering and leaving the site.

Construction Management

- 7.77 A Construction Environmental Management Plan, prepared by Tilbury Douglas Construction, accompanies this application. This document sets out how construction activities will be managed for the construction of the new leisure centre and demolition of the existing centre and public house. This includes details on: the management of deliveries, loading and unloading arrangements, access to and from the site and contractor car parking.

Travel Plan

- 7.78 A Framework Travel Plan, prepared by Stantec, also accompanies this application. This document aims to reduce the number of car trips to and from the proposed development by promoting a range of sustainable alternatives, encouraging the use of these modes.
- 7.79 A review of the existing and proposed site accessibility has been undertaken and concludes that a good provision of walking and public transport services currently serve the site.
- 7.80 Challenging mode share targets have been presented which aim to reduce car-based travel by 10% over a developer supported period following occupation of the site. An action plan has been presented which aims to reduce car-based travel to and from the site.
- 7.81 In accordance with Policy CS11 of the Core Strategy, a Transport Assessment and Travel Plan have been provided. Together, these reports detail how the development mitigates impacts on the highways network in line with Policy CS11 and Policy T1. On this basis, it is considered that the local policy requirements, relating to transport, have been met.

Flood Risk

- 7.82 Policy CS18 of the Core Strategy requires that all proposals for development on sites at risk of flooding must be accompanied by a Flood Risk Assessment. With regard to drainage, the Council will seek to minimise the impact from new development on waste-water systems, requiring that surface water run-off must have no greater adverse impact than the existing use, and that SuDS are used on all developments where technically and financially feasible.
- 7.83 A Flood Risk Assessment & Drainage Strategy has been prepared by Furness Consulting Engineers to accompany this application.
- 7.84 The report details that the site lies in Flood Zone 1, which indicates a low risk of flooding. The site is at a low risk from flooding when considering all sources, including surface, groundwater, overland, and fluvial. As the redevelopment does not propose a change of use, the site is considered less vulnerable, and hence, the exception test was not required to be undertaken.

- 7.85 With regards to the drainage strategy, the site has been split into two main catchment areas, the proposed leisure centre building and the new main car park to the north of the site. A total positively drained area of 1.584 hectares was used. Traditional below ground drainage will intercept rainwater falling on the leisure centre building, and a permeable pavement will cover the new car park. Both areas will connect to 6no. cellular soakaways proposed under the car park which will enable the rainwater to discharge into the ground.
- 7.86 The proposed drainage strategy is considered to bring about a slight improvement to the flood risk of the site, through the use of the permeable pavement and soakaway, which will ensure stormwater is slowly discharged into the ground, mimicking natural processes.
- 7.87 New foul drainage is proposed for the leisure centre building, which includes a pool water backwash tank, which will need to be pumped at the same rate as existing, or a rate to be agreed. The final point of connection from the site needs to be determined during later design stages.
- 7.88 The accompanying Flood Risk Assessment details that the site is at low risk of flooding. In accordance with Policy CS18, the use of permeable pavements and a soakaway will ensure that the proposed development will result in a slight improvement to the flood risk of the site. It is therefore considered that the policy requirements have been met.

Energy and Sustainability

- 7.89 Policy CS18 of the Core Strategy supports proposals that lead to a reduction in carbon footprint. The policy states that non-residential development proposals of 1,000 sqm and above will be required to meet the BREEAM “excellent” standards of water efficiency and include provision for the collection of rainwater.
- 7.90 This application is accompanied by an Energy and Low Carbon Technology Statement, prepared by Desco, which details the scheme’s approach to energy and sustainability and outlines how the policy requirements are met.
- 7.91 The leisure centre building will incorporate the following measures to secure a highly energy efficient building:
- Heating and cooling provided via heat recovery air source heat pumps;
 - Ventilation systems to incorporate high heat recovery;
 - Wastewater heat recovery system to reclaim heat from waste shower water;
 - Provision of Photovoltaic Panels on the roof;
 - Proposed building to be all electric, ensuring the building is carbon zero ready; and
 - Making best use of passive measures, such as maximising natural daylight and making use of thermal mass.
- 7.92 When measured for Building Regulations Part L compliance, the proposed building will have carbon emissions 45% lower than required and 13 times lower than the existing building. Primary energy use of the proposed development will be 45% lower than a Building Regulations compliant building. The proposed building will have an estimated EPC rating of A, just short of a net zero carbon building, compared to a B (almost C) rating for the existing building.

- 7.93 As outlined above, the proposal will achieve significant reductions in energy consumption in comparison with the existing premises, therefore complying with the requirements of Policy CS18.

Water Efficiency

- 7.94 In order to achieve BREEAM 'excellent' standards of water efficiency, there will be careful consideration regarding the selection of sanitaryware to ensure the water outlets are low water usage. Flow restrictors will also be considered if necessary to ensure that the policy requirements are met. This is to achieve a 12.5 per cent improvement over the baseline water consumption of the building, as outlined in the BREEAM criteria.
- 7.95 It is not proposed to install a rainwater harvesting system, given that other strategies are being employed to reduce water consumption and increase efficiency.
- 7.96 In line with the recommendations of the Energy Statement, measures will be introduced to ensure the required standards of water efficiency are met. On this basis, it is considered that the proposal is compliant with the relevant requirements of Policy CS18.

Archaeology

- 7.97 Policy CS20 of the Core Strategy states that the Council will support proposals which preserve and enhance the significance of the Borough's heritage assets, including the surviving built features and archaeology.
- 7.98 A detailed Archaeological Desk-Based Assessment has been prepared by Wessex Archaeology to accompany this application. This study seeks to assess the known and potential archaeological resource within the site and the surrounding area, and to assess the likely impacts of the development proposals on this resource.
- 7.99 This assessment has established that there is an archaeological interest within the site, as there is the potential for the presence of buried archaeological remains. There is particular potential for buried prehistoric and Romano-British remains and remains relating to Gravesend Airport which served as a RAF aerodrome in the Second World War.
- 7.100 Due to a lack of previous archaeological investigation, the presence, location and significance of any buried heritage assets within the site cannot currently be confirmed on the basis of the available information. As such it is possible that additional archaeological investigations may be required by the planning archaeologist for Kent County Council. The need for, scale, scope and nature of any further archaeological works should be agreed through consultation with the statutory authorities.
- 7.101 The masterplan indicates a proposed car parking area is to be located on the site of the current leisure centre buildings, which includes a WWII memorial. Due to its role in highlighting and memorialising the Site's significance in the Second World War, the retention or relocation of the memorial area would be recommended for inclusion in the proposed scheme. Additionally, the proposed development represents an opportunity to enhance the provision of heritage interpretation resources (such as information boards) to further commemorate on the Site's heritage value with regards to the Second World War.

- 7.102 In accordance with the requirements of Policy CS20, the Desk-Based Assessment outlines how the proposal will preserve and enhance the significance of the archaeological resource within the site and the surrounding area. On this basis, it is considered that the policy requirements of Policy CS20 have been met.

Environmental Issues

Contamination

- 7.103 Policy CS19 of the Core Strategy requires that new development will be located, designed and constructed to avoid adverse impacts from land contamination.
- 7.104 In order to assess the site for potential contamination, a Phase I Desk Study has been prepared by Furness Partnership Ltd to accompany this application. The Desk Study comprises a review of the readily available geological, historical and environmental sources for information about the site, together with a walkover survey of the area.
- 7.105 During the walkover survey, no obvious potential sources of contamination were noted externally. The chemicals used to treat the swimming pools are stored in a secure area, with bunding and concrete flooring to restrict any spillages/leakages and the chemicals are mixed in a dedicated area prior to their addition to the pool water.
- 7.106 The anticipated groundwater profile is thought to be in excess of 20m below ground level. Hence, the proposed redevelopment is unlikely pose a threat. The majority of the northern part of the site is indicated as being within an area at very low risk of ground dissolution features. However, the southern part of the site is in areas of moderate risk. No natural cavities are recorded within 500m of the site.
- 7.107 The Desk Study notes that it would be prudent to carry out an intrusive investigation to prove the underlying natural strata and absence of any made ground and confirm that the near surface soils are suitable for their intended setting. This should target historical features such as former structures, AA gun site and workshops, as well as areas of made ground highlighted on geological mapping. The proposed scope of testing should include for contaminants identified within the CSM, which includes heavy metals and hydrocarbons. It would also be advisable to complete ground gas monitoring in view of the possible presence of made ground on site and to the south-east of the site.

UXO Survey

- 7.108 An Unexploded Bomb Risk Map shows that the site is in a high-risk area, as the site was part of RAF Gravesend during WWII. There is a lack of clear evidence of the complete removal of all ordnance from the airfield and the limited post-WWII redevelopment of the Site. On this basis, a Detailed Unexploded Ordnance (UXO) Threat & Risk Assessment was carried out by Landmark Information Group.
- 7.109 The assessment concludes it to be likely that any UXO within post-war disturbed and developed ground would potentially have been discovered and removed. However, the potential for deep buried UXO to be present within any remaining areas of undisturbed ground is assessed to be extant. On this basis, a number of recommendations for risk mitigation measures are provided to reduce risks as low as reasonably practicable during intrusive works in all previously undisturbed ground.

- 7.110 Provided that the recommendations of the Phase I Desk Study and Detailed Unexploded Ordnance (UXO) Threat & Risk Assessment are carried out, it is considered that this proposal complies with the requirements of Policy CS19.

Air Quality

- 7.111 Policy CS19 of Gravesham's Core Strategy requires that new development will be located, designed and constructed to avoid adverse environmental impacts, including air pollution.
- 7.112 An Air Quality Assessment has been prepared by Stantec UK Limited to accompany this application. This report notes that the site is not located within an AQMA and pollutant concentrations recorded at nearby monitoring locations have been in compliance with the relevant objectives in recent years. The report considers the suitability of the site for a leisure centre development and assesses the impact of the construction and operation of the Proposed Development on air quality in the surrounding area.
- 7.113 The main air pollutants of concern related to construction are dust and fine particulate matter (PM10). It is recommended that a package of mitigation measures in accordance with the IAQM guidance is put in place to minimise the risk of elevated PM10 concentrations and dust soiling in the surrounding area. With mitigation in place the construction impacts are judged as being 'not significant'.
- 7.114 The main air pollutants of concern during the operational period are nitrogen dioxide (NO2), PM10 and PM2.5 emissions associated with road traffic. The air quality impacts relating to road traffic are considered to be 'not significant' and additional mitigation is not required. Nonetheless, a package of mitigation measures to reduce vehicle trips will be implemented through a Framework Travel Plan for the Site.
- 7.115 It is expected that any proposed combustion plant will replace older, more polluting combustion plant currently in operation. Combustion emissions are therefore not expected to increase, and a detailed assessment of combustion emissions has been scoped out of this assessment. Notwithstanding this, it is recommended that a detailed assessment is undertaken at the detailed design stage of the Proposed Development should significant combustion-based on-site heating plant be proposed.
- 7.116 An air quality damage cost analysis has been undertaken for the Proposed Development, which outlines that the cost of implementation of mitigation is expected to exceed the calculated air quality damage cost. However, this will be confirmed at the detailed design stage.
- 7.117 A Construction, Environmental Management Plan (CEMP) has been prepared by Tilbury Douglas Construction and accompanies this application. This report outlines that the groundworks and carpark construction have the potential for dust generation. The CEMP details a number of mitigation measures that will be adopted to reduce and manage dust and other emissions from site activities during the construction period. These measures relate to the following stages:
- a Pre-project planning and management;
 - b Site preparation and construction;
 - c Haulage routes, vehicles and plant; and

d Materials handling, storage, stockpiles, spillage and disposal.

7.118 Full details on the measures recommended to mitigate dust generation are provided in the accompanying CEMP.

7.119 Based on the above, it is considered that the proposal complies with Policy CS19 of Gravesham's Core Strategy and the requirements of the NPPF.

Noise and Vibration

7.120 Policy CS19 of the Core Strategy requires that new development avoids generating adverse environmental impacts, including noise.

7.121 A Noise Impact Assessment, prepared by Stantec, accompanies this application. This comprises an environmental sound survey to establish the existing environmental sound levels, at a position considered representative of the nearest noise sensitive receptors.

7.122 The results of this survey have been used to determine background sound levels which form the basis of the target noise criteria. Assessment criteria have been proposed based on the requirements of the Local Planning Authority and applicable guidance documents. Building services plant noise emission limits criteria have been set to background sound level.

7.123 The change in noise level due to road traffic noise associated with the proposed redevelopment is likely to be negligible and unintrusive and below the lowest observed adverse effect level.

7.124 Full information on the plant specification was not available at this stage. It is therefore understood that further assessment may be required post planning when further information is available. The applicant would be happy to accept a condition, relating to the provision of a more detailed plant noise impact assessment, should this be required.

7.125 The CEMP details a number of mitigation measures that will be implemented by contractors to minimise noise and vibration generated from site activities during construction.

- Site hoarding to public boundaries;
- Controlled lorry movements;
- Use of modern plant with inherent noise suppression;
- Use of screens around static plant, and other temporary acoustic barriers where appropriate;
- Switching off plant which is not in use;
- Appropriate handling of storage materials;
- Consideration of working hours, particularly for noisy activities;
- With larger impact breakers, acoustic screens to be utilised;
- Regular maintenance of plant in accordance with manufacturer's instructions; and
- Regular communications held between contractors, local authority officers and neighbours.

Full details are provided in the accompanying CEMP.

- 7.126 Provided that the plant specification accords with the noise criteria outlined in the Noise Impact Assessment and the measures outlined in the CEMP are complied with, this development will ensure the avoidance of adverse impacts relating to noise. On this basis, the proposal will comply with the requirements of Policy CS19 of the Core Strategy.

Ecology and Biodiversity

- 7.127 Policy CS12 of the Core Strategy states that a net loss of biodiversity will not be permitted, whilst opportunities to enhance, restore, re-create, and maintain habitats will be sought. Where a negative impact on protected or priority habitats/species cannot be avoided and the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.
- 7.128 A detailed Preliminary Ecological Appraisal (PEA) has been prepared by Lloyd Bore to accompany this application. This report provides an assessment of the likelihood of presence of relevant legally protected species and Species of Principal Importance on site.
- 7.129 It is outlined that there are two statutory designated sites of importance for nature conservation located within relevant distance of the application site. In addition, there is an on-site hedgerow that qualifies as a Habitat of Principal Importance. The proposals result in the loss of this on-site hedgerow (50m in length), however, to compensate for this loss, the landscape design proposes a total length of 200m of species-rich hedgerow to be provided along the southern boundary line.
- 7.130 The application site provides suitable habitat for common reptile species, nesting birds, foraging and roosting bats, badgers and hazel dormice. A Badger Field Sign Survey found no evidence of use of the site by this species. A Bat Emergence Survey was completed in September 2022. The full results of this survey are provided in the Bat Survey Report, prepared by Lloyd Bore, which also accompanies this application.
- 7.131 The Bat Survey Report confirmed a likely absence of roosting bats, with no bats recorded emerging from the building. During the survey, common pipistrelle bats were recorded using the site for foraging. In order to ensure the continued use of the site for foraging, enhancement of the retained open green spaces should include native species shrub and tree planting that encourage a greater number and diversity of invertebrates and create more sheltered dark areas for foraging. It is also recommended that at least six new bat boxes are installed onto retained existing trees along the boundaries of the site.
- 7.132 The Bat Survey Report states that no additional bat survey or assessment is required to inform the determination of the planning application. The results of the survey and the conclusions of the report remain valid for 12 months, after which time a suitably experienced ecologist will need to review whether any update survey work is required prior to the commencement of works on site.
- 7.133 The results of the PEA outline that the proposed development would not have any negative impact protected species. Recommendations are provided to enhance biodiversity and ensure positive impacts on protected species. It is considered that provided these recommendations are adopted, the requirements of Policy CS12 will be met.

Arboricultural Impact

- 7.134 In line with the requirements of Policy CS12, an Arboricultural Report has been prepared by Lloyd Bore to accompany this application. This report provides details of significant trees and outlines that there are 24 individual trees and 20 tree groups on the application site. 9 individual trees and 5 tree groups have been categorised as B grade of moderate quality and value. 15 individual trees and 15 tree groups have been categorised as C grade of low quality and value. These are shown on the accompanying Tree Survey Plan.
- 7.135 An Arboricultural Impact Assessment, prepared by Lloyd Bore, provides an assessment of the impact the proposed development may have on nearby trees and the effect retained trees may have on the development. It is outlined that 3 groups of Category C trees will require removal. A Tree Protection Plan is provided, which shows trees to be retained, trees to be removed and tree protection measures. These measures consist of tree protection barriers and ground protection measures. The Arboricultural Impact Assessment provides a number of recommendations, to be adhered to during design and construction.
- 7.136 As shown on the Tree Protection Plan, the proposal retains the vast majority of trees on site, with removal proposed only where absolutely necessary. All recommended measures will be taken to ensure the protection of retained trees. It is considered that the overall requirements of Policy CS19 have therefore been met.

8.0 Summary and Conclusions

- 8.1 This Planning Statement has been prepared on behalf of the Communities Directorate of Gravesham Borough Council (GBC) to accompany a full planning application for the redevelopment of the Cascades Leisure Centre site in Gravesend.
- 8.2 The application seeks permission for:
- “Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the Site to provide a new leisure centre with community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking”.*
- 8.3 The application proposals have been developed following a 7-year period of stakeholder and community engagement and various feasibility studies into the future of leisure provision within the Borough. The detailed design of the scheme has been developed following a significant level of consultation with a number statutory and non-statutory groups. The Consultation Report submitted with the application describes how the local community has been consulted, along with the details of the feedback received, including a significant level of local support for the scheme.
- 8.4 In terms of site designations, the Site is in the Green Belt. Section 7.0 of this statement (paragraph 7.9 onwards) deals with the proposed development in relation to paragraph 149 of the NPPF which sets out a number of exemptions where development in the Green Belt is not inappropriate. The proposals comply with paragraph 149(d), which allows for the replacement of a building within the Green Belt provided it is not materially larger than the one it replaces, and paragraph 149(g), which allows for partial or complete redevelopment of previously developed land provided it would not have a greater impact on, or cause substantial harm to, the openness of the Green Belt.
- 8.5 Whilst the proposed leisure represents a small increase in floorspace (5%), in comparison to the existing leisure centre, it has a reduced footprint and is more efficiently organised. There is a limited landscape impact, due to the net limited change that the proposed development constitutes. The proposals retain the Site’s overall character as a leisure facility and seek to improve the facility by consolidating the existing functions of Site. Visual effects resulting from the proposed development are very limited, largely due to the inherent screening ability of mature trees within and around the Site. Overall, it is concluded that the proposals would result in no greater impact on the openness of the Green Belt and therefore the development fully meets the requirements of paragraph 149, part d) and part g) of the NPPF and is not inappropriate development within the Green Belt.
- 8.6 The Site is also in a highly sustainable location, given its position on previously developed land on the eastern edge of Gravesend Town Centre. The facility will make the best use of existing land and provide an uplift of leisure floorspace in a location where ease of walking, cycling and public transport modes makes the Site easily accessible to both local residents and visitors. The facility has the potential to improve health and social outcomes for locals by way of provision of a range of high quality leisure and community facilities.

- 8.7 The proposed development will also provide both direct and indirect economic benefits to the area. The new centre will create additional employment in the form of both skilled and unskilled jobs and will also create stimulus in the local supply chain through additional demand.
- 8.8 Overall, the proposed development is consistent with relevant local and national policies and relevant supplementary guidance and the benefits of the scheme weigh heavily in its favour. Notwithstanding the Site's Green Belt location, the proposals accord with the statutory development plan as a whole. On that basis, the presumption in favour of sustainable development applies and the planning application should be approved.

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