



# TONBRIDGE & MALLING BOROUGH COUNCIL

## EXECUTIVE SERVICES

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**Chief Executive**  
Damian Roberts

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**NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.**

Contact: Democratic Services  
[committee.services@tmbc.gov.uk](mailto:committee.services@tmbc.gov.uk)

17 September 2025

To: MEMBERS OF THE AREA 3 PLANNING COMMITTEE  
(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Area 3 Planning Committee to be held in the Council Chamber, Gibson Drive, Kings Hill on Thursday, 25th September, 2025 commencing at 7.30 pm.

Members of the Committee are required to attend in person. Other Members may attend in person or participate online via MS Teams.

Information on how to observe the meeting will be published on the Council's website. Deposited plans can be viewed online by using [Public Access](#).

Yours faithfully

DAMIAN ROBERTS

Chief Executive

## A G E N D A

1. Guidance for the Conduct of Meetings

5 - 8

## **PART 1 - PUBLIC**

2. Apologies for Absence
3. Declarations of Interest

Members are reminded of their obligation under the Council's Code of Conduct to disclose any Disclosable Pecuniary Interests and Other Significant Interests in any matter(s) to be considered or being considered at the meeting. These are explained in the Code of Conduct on the Council's website at [Code of conduct for members – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](http://tmbc.gov.uk).

Members in any doubt about such declarations are advised to contact Legal or Democratic Services in advance of the meeting.

4. Minutes 9 - 12

To confirm as a correct record the Minutes of the meeting of Area 3 Planning Committee held on 5 June 2025.

5. Glossary and Supplementary Matters 13 - 20

Glossary of abbreviations used in reports to the Area Planning Committee (attached for information)

Any supplementary matters will be circulated via report in advance of the meeting and published to the website.

### **Matters for Decision under Delegated Powers (In accordance with Part 3 of the Constitution)**

6. TM/25/01319/PA - Cobdown Sports Ground, Station Road, 21 - 110  
Ditton, Aylesford

Full planning permission for development at Cobdown Park to provide a football training centre (sui generis), comprising of the demolition and redevelopment of existing Clubhouse building, refurbishment of existing Academy building; demolition of ancillary buildings and structures across the Site; provision of new grounds maintenance building and service area; refurbishment of existing pavilion building to provide upgraded changing and kitchen facilities; provision of new upgraded grass football pitches and upgrade of existing synthetic surface; new areas for car and cycle parking; upgrade to existing sports lighting; boundary treatment and hard and soft landscaping and associated site infrastructure and site plant.

### **Matters for Information**

7. Planning Appeals, Public Inquiries and Hearings 111 - 112

To receive and note any update in respect of planning appeals, public inquiries and hearings held since the last meeting of the Planning Committee.

8. Urgent Items

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

**Matters for consideration in Private**

9. Exclusion of Press and Public

113 - 114

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

**PART 2 - PRIVATE**

10. Urgent Items

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

## **MEMBERSHIP**

Cllr D Thornewell (Chair)  
Cllr R W Dalton (Vice-Chair)

Cllr Mrs S Bell  
Cllr A G Bennison  
Cllr T Bishop  
Cllr R I B Cannon  
Cllr L Chapman  
Cllr D A S Davis

Cllr S M Hammond  
Cllr P M Hickmott  
Cllr D Keers  
Cllr A McDermott  
Cllr Mrs A S Oakley  
Cllr C J Williams

## **GUIDANCE ON HOW MEETINGS WILL BE CONDUCTED**

- (1) Most of the Borough Council meetings are livestreamed, unless there is exempt or confidential business being discussed, giving residents the opportunity to see decision making in action. These can be watched via our YouTube channel. When it is not possible to livestream meetings they are recorded and uploaded as soon as possible:

<https://www.youtube.com/channel/UCPp-IJISNgoF-ugSzxiAPfw/featured>

- (2) There are no fire drills planned during the time a meeting is being held. For the benefit of those in the meeting room, the fire alarm is a long continuous bell and the exits are via the doors used to enter the room. An officer on site will lead any evacuation.
- (3) Should you need this agenda or any of the reports in a different format, or have any other queries concerning the meeting, please contact Democratic Services on [committee.services@tmhc.gov.uk](mailto:committee.services@tmhc.gov.uk) in the first instance.

### **Attendance:**

- Members of the Committee are required to attend in person and be present in the meeting room. Only these Members are able to move/ second or amend motions, and vote.
- Other Members of the Council can join via MS Teams and can take part in any discussion and ask questions, when invited to do so by the Chair, but cannot move/ second or amend motions or vote on any matters. Members participating remotely are reminded that this does not count towards their formal committee attendance.
- Occasionally, Members of the Committee are unable to attend in person and may join via MS Teams in the same way as other Members. However, they are unable to move/ second or amend motions or vote on any matters if they are not present in the meeting room. As with other Members joining via MS Teams, this does not count towards their formal committee attendance.
- Officers can participate in person or online.

- Members of the public addressing an Area Planning Committee should attend in person. However, arrangements to participate online can be considered in certain circumstances. Please contact [committee.services@tmhc.gov.uk](mailto:committee.services@tmhc.gov.uk) for further information.

Before formal proceedings start there will be a sound check of Members/Officers in the room. This is done as a roll call and confirms attendance of voting Members.

### **Ground Rules:**

The meeting will operate under the following ground rules:

- Members in the Chamber should indicate to speak in the usual way and use the fixed microphones in front of them. These need to be switched on when speaking or comments will not be heard by those participating online. Please switch off microphones when not speaking.
- If there any technical issues the meeting will be adjourned to try and rectify them. If this is not possible there are a number of options that can be taken to enable the meeting to continue. These will be explained if it becomes necessary.

For those Members participating online:

- please request to speak using the 'chat or hand raised function';
- please turn off cameras and microphones when not speaking;
- please do not use the 'chat function' for other matters as comments can be seen by all;
- Members may wish to blur the background on their camera using the facility on Microsoft teams.
- Please avoid distractions and general chat if not addressing the meeting
- Please remember to turn off or silence mobile phones

### **Voting:**

Voting may be undertaken by way of a roll call and each Member should verbally respond For, Against, Abstain. The vote will be noted and announced by the Democratic Services Officer.

Alternatively, votes may be taken by general affirmation if it seems that there is agreement amongst Members. The Chairman will announce the outcome of the vote for those participating and viewing online.

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## **TONBRIDGE AND MALLING BOROUGH COUNCIL**

### **AREA 3 PLANNING COMMITTEE**

#### **MINUTES**

**Thursday, 5th June, 2025**

**Present:** Cllr D Thornevell (Chair), Cllr R W Dalton (Vice-Chair),  
Cllr Mrs S Bell, Cllr A G Bennison, Cllr R I B Cannon,  
Cllr D A S Davis, Cllr P M Hickmott, Cllr D Keers and  
Cllr C J Williams

**In attendance:** Councillor Mrs T Dean was also present pursuant to Council Procedure Rule No 15.21.

Apologies for absence were received from Councillors T Bishop, L Chapman, S M Hammond, A McDermott\* and Mrs A S Oakley\*

(\*submitted apologies for in-person attendance and joined the meeting remotely)

#### **PART 1 - PUBLIC**

##### **AP3 25/13 DECLARATIONS OF INTEREST**

There were no declarations of interest made in accordance with the Code of Conduct.

##### **AP3 25/14 MINUTES**

**RESOLVED:** That the Minutes of the meeting of the Area 3 Planning Committee held on 10 April 2025 be approved as a correct record and signed by the Chairman.

##### **AP3 25/15 GLOSSARY AND SUPPLEMENTARY MATTERS**

Decisions were taken on the following applications subject to the pre-requisites, informatives, conditions or reasons for refusal set out in the report of the Director of Planning, Housing and Environmental Health or in the variations indicated below. Any supplementary reports were tabled at the meeting.

Members of the public addressed the meeting where the required notice had been given and their comments were taken into account by the Committee when determining the application. Speakers are listed under the relevant planning application shown below.

**MATTERS FOR DECISION UNDER DELEGATED POWERS (IN  
ACCORDANCE WITH PART 3 OF THE CONSTITUTION)**

**AP3 25/16 TM/24/00769/PA - LAND & BUILDING EAST OF ROSE COTTAGE,  
440 LUNSFORD LANE, LARKFIELD, AYLESFORD**

Demolition of existing building and the erection of a new building comprising a mixed use office and workshop space (Class E(g)) and detached garage to rear.

Following a Members' Site Inspection undertaken as a result of the deferral of the application arising from the Committee meeting on 13 March 2025, careful consideration was given to the points raised by the speakers and the submitted details, conditions and informatives set out in the report of the Director of Planning, Housing and Environmental Health. Members continued to express significant concerns in respect of the potential impact of the proposed commercial development on the residential amenity of the neighbourhood area, with particular reference made to the increased level of vehicular movements and environmental disturbance.

It was proposed by Councillor D Thornewell, seconded by Councillor R Dalton, that the application be refused, which was supported by the Committee with eight Members voting in favour and one member voting against the motion.

**RESOLVED:** that planning permission be REFUSED for the following reason:

The vehicular movements, alongside the commercial activities associated with the development proposal, would result in a material change in the noise climate and level of disturbance, which would be unduly detrimental to the residential amenity of the occupiers of the neighbouring houses. To permit the development in its current form would be contrary to Policy CP24 of the Tonbridge and Malling Borough Core Strategy (2007) and Chapter 12 of the National Planning Policy Framework (2024).

[Speakers: Ms M Conyers, Mrs D Hart (on behalf of Mr D Carslaw), Ms L Wheeldon (on behalf of Mrs D Eden-Green), Ms L Wheeldon (on behalf of Mr J Eden-Green), Mr C Twyman, Mrs D Hart (on behalf of Mr J Humphries), Mr C Green, Mr C Twyman (on behalf of Ms T Allingham), Mr C Twyman (on behalf of Mr G Hart), Ms F Ray and Mrs D Hart (members of the public) and Mr P Hadley (Agent on behalf of the Applicant) addressed the Committee in person.]

**MATTERS FOR INFORMATION****AP3 25/17 PLANNING APPEALS, PUBLIC INQUIRIES AND HEARINGS**

The report setting out updates in respect of planning appeals, public inquiries and hearings held since the last meeting of the Planning Committee was received and noted.

**AP3 25/18 EXCLUSION OF PRESS AND PUBLIC**

There were no items considered in private.

The meeting ended at 8.45 pm  
with a break between 8.27 pm and 8.37 pm

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## **GLOSSARY of Abbreviations used in reports to Area Planning Committees**

### **A**

|      |                                                      |
|------|------------------------------------------------------|
| AAP  | Area of Archaeological Potential                     |
| AGA  | Prior Approval: Agriculture (application suffix)     |
| AGN  | Prior Notification: Agriculture (application suffix) |
| AODN | Above Ordnance Datum, Newlyn                         |
| AONB | Area of Outstanding Natural Beauty                   |
| APC1 | Area 1 Planning Committee                            |
| APC2 | Area 2 Planning Committee                            |
| APC3 | Area 3 Planning Committee                            |
| AT   | Advertisement consent (application suffix)           |

### **B**

|      |                                             |
|------|---------------------------------------------|
| BALI | British Association of Landscape Industries |
| BPN  | Building Preservation Notice                |
| BRE  | Building Research Establishment             |

### **C**

|        |                                                              |
|--------|--------------------------------------------------------------|
| CA     | Conservation Area (designated area)                          |
| CCEASC | KCC Screening Opinion (application suffix)                   |
| CCEASP | KCC Scoping Opinion (application suffix)                     |
| CCG    | NHS Kent and Medway Group                                    |
| CNA    | Consultation by Neighbouring Authority (application suffix)  |
| CPRE   | Council for the Protection of Rural England                  |
| CR3    | County Regulation 3 (application suffix – determined by KCC) |
| CR4    | County Regulation 4 (application suffix – determined by KCC) |
| CTRL   | Channel Tunnel Rail Link (application suffix)                |

## **D**

|        |                                                        |
|--------|--------------------------------------------------------|
| DCLG   | Department for Communities and Local Government        |
| DCMS   | Department for Culture, Media and Sport                |
| DEEM   | Deemed application (application suffix)                |
| DEFRA  | Department for the Environment, Food and Rural Affairs |
| DEPN   | Prior Notification: Demolition (application suffix)    |
| DfT    | Department for Transport                               |
| DLADPD | Development Land Allocations Development Plan Document |
| DMPO   | Development Management Procedure Order                 |
| DPD    | Development Plan Document                              |
| DPHEH  | Director of Planning, Housing & Environmental Health   |
| DR3    | District Regulation 3                                  |
| DR4    | District Regulation 4                                  |
| DSSLT  | Director of Street Scene, Leisure & Technical Services |

## **E**

|      |                                                                        |
|------|------------------------------------------------------------------------|
| EA   | Environment Agency                                                     |
| EIA  | Environmental Impact Assessment                                        |
| EASC | Environmental Impact Assessment Screening request (application suffix) |
| EASP | Environmental Impact Assessment Scoping request (application suffix)   |
| EH   | English Heritage                                                       |
| EL   | Electricity (application suffix)                                       |
| ELB  | Ecclesiastical Exemption Consultation (Listed Building)                |
| EEO  | Ecclesiastical Exemption Order                                         |
| ELEX | Overhead Lines (Exemptions)                                            |
| EMCG | East Malling Conservation Group                                        |
| ES   | Environmental Statement                                                |
| EP   | Environmental Protection                                               |

## **F**

|      |                                                       |
|------|-------------------------------------------------------|
| FRA  | Flood Risk Assessment                                 |
| FC   | Felling Licence                                       |
| FL   | Full Application (planning application suffix)        |
| FLX  | Full Application: Extension of Time                   |
| FLEA | Full Application with Environmental Impact Assessment |

## **G**

|      |                                                                                    |
|------|------------------------------------------------------------------------------------|
| GDPO | Town & Country Planning (General Development Procedure)<br>Order 2015              |
| GOV  | Consultation on Government Development                                             |
| GPDO | Town & Country Planning (General Permitted Development)<br>Order 2015 (as amended) |

## **H**

|      |                                              |
|------|----------------------------------------------|
| HE   | Highways England                             |
| HSE  | Health and Safety Executive                  |
| HN   | Hedgerow Removal Notice (application suffix) |
| HWRC | Household Waste Recycling Centre             |

## **I**

|      |                                                                          |
|------|--------------------------------------------------------------------------|
| IDD  | Internal Drainage District                                               |
| IDB  | Upper Medway Internal Drainage Board                                     |
| IGN3 | Kent Design Guide Review: Interim Guidance Note 3 Residential<br>Parking |

## **K**

|        |                                                                                         |
|--------|-----------------------------------------------------------------------------------------|
| KCC    | Kent County Council                                                                     |
| KCCVPS | Kent County Council Vehicle Parking Standards: Supplementary<br>Planning Guidance SPG 4 |
| KDD    | KCC Kent Design document                                                                |

|      |                              |
|------|------------------------------|
| KFRS | Kent Fire and Rescue Service |
| KGT  | Kent Garden Trust            |
| KWT  | Kent Wildlife Trust          |

## **L**

|       |                                                                                  |
|-------|----------------------------------------------------------------------------------|
| LB    | Listed Building Consent (application suffix)                                     |
| LBX   | Listed Building Consent: Extension of Time                                       |
| LDF   | Local Development Framework                                                      |
| LDLBP | Lawful Development Proposed Listed Building (application suffix)                 |
| LEMP  | Landscape and Ecology Management Plan                                            |
| LLFA  | Lead Local Flood Authority                                                       |
| LMIDB | Lower Medway Internal Drainage Board                                             |
| LPA   | Local Planning Authority                                                         |
| LWS   | Local Wildlife Site                                                              |
| LDE   | Lawful Development Certificate: Existing Use or Development (application suffix) |
| LDP   | Lawful Development Certificate: Proposed Use or Development (application suffix) |
| LP    | Local Plan                                                                       |
| LRD   | Listed Building Consent Reserved Details (application suffix)                    |

## **M**

|         |                                                                    |
|---------|--------------------------------------------------------------------|
| MBC     | Maidstone Borough Council                                          |
| MC      | Medway Council (Medway Towns Unitary Authority)                    |
| MCA     | Mineral Consultation Area                                          |
| MDE DPD | Managing Development and the Environment Development Plan Document |
| MGB     | Metropolitan Green Belt                                            |
| MHCL    | Ministry of Housing, Communities and Local Government              |
| MIN     | Mineral Planning Application (application suffix, KCC determined)  |
| MSI     | Member Site Inspection                                             |

MWLP Minerals & Waste Local Plan

## **N**

NE Natural England

NMA Non Material Amendment (application suffix)

NPPF National Planning Policy Framework

## **O**

OA Outline Application (application suffix)

OAEA Outline Application with Environment Impact Assessment (application suffix)

OAX Outline Application: Extension of Time

OB1O6D Details pursuant to S106 obligation (application suffix)

OB106M Modify S106 obligation by agreement (application suffix)

OB106V Vary S106 obligation (application suffix)

OB106X Discharge S106 obligation (application suffix)

## **P**

PC Parish Council

PD Permitted Development

PD4D Permitted development - change of use flexible 2 year

PDL Previously Developed Land

PDRA Permitted development – change of use agricultural building to flexible use (application suffix)

PDV14J Permitted development - solar equipment on non-domestic premises (application suffix)

PDV18 Permitted development - miscellaneous development (application suffix)

PDVAF Permitted development – agricultural building to flexible use (application suffix)

PDVAR Permitted development - agricultural building to residential (application suffix)

|        |                                                                                     |
|--------|-------------------------------------------------------------------------------------|
| PLVLR  | Permitted development - larger residential extension (application suffix)           |
| PDVOR  | Permitted development - office to residential (application suffix)                  |
| PDVPRO | Permitted development - pub to retail and/or office (application suffix)            |
| PDVSDR | Permitted development storage/distribution to residential (application suffix)      |
| PDVSFR | Permitted development (application suffix) PD – shops and financial to restaurant   |
| PDVSR  | Permitted development (application suffix) PD – shop and sui generis to residential |
| POS    | Public Open Space                                                                   |
| PPG    | Planning Practice Guidance                                                          |
| PWC    | Prior Written Consent                                                               |
| PROW   | Public Right Of Way                                                                 |

## **R**

|    |                                       |
|----|---------------------------------------|
| RD | Reserved Details (application suffix) |
| RM | Reserved Matters (application suffix) |

## **S**

|      |                                                                          |
|------|--------------------------------------------------------------------------|
| SDC  | Sevenoaks District Council                                               |
| SEW  | South East Water                                                         |
| SFRA | Strategic Flood Risk Assessment (background for the emerging Local Plan) |
| SNCI | Site of Nature Conservation Interest                                     |
| SPAB | Society for the Protection of Ancient Buildings                          |
| SPD  | Supplementary Planning Document                                          |
| SSSI | Site of Special Scientific Interest                                      |
| SW   | Southern Water                                                           |

## **T**

|       |                                        |
|-------|----------------------------------------|
| TC    | Town Council                           |
| TCAAP | Tonbridge Town Centre Area Action Plan |

|            |                                                                |
|------------|----------------------------------------------------------------|
| TCS        | Tonbridge Civic Society                                        |
| TEPN56/TEN | Prior Notification: Telecoms (application suffix)              |
| TMBC       | Tonbridge & Malling Borough Council                            |
| TMBCS      | Tonbridge & Malling Borough Core Strategy 2007                 |
| TMBLP      | Tonbridge & Malling Borough Local Plan 1998                    |
| TNCA       | Notification: Trees in Conservation Areas (application suffix) |
| TPOC       | Trees subject to TPO (application suffix)                      |
| TRD        | Tree Consent Reserved Details (application suffix)             |
| TRICS      | Trip Rate Information Computer System                          |
| TWBC       | Tunbridge Wells Borough Council                                |

## **U**

|       |                                                               |
|-------|---------------------------------------------------------------|
| UCO   | Town and Country Planning Use Classes Order 1987 (as amended) |
| UMIDB | Upper Medway Internal Drainage Board                          |

## **W**

|     |                                                      |
|-----|------------------------------------------------------|
| WAS | Waste Disposal Planning Application (KCC determined) |
| WTS | Waste Transfer Station                               |

(Version 2/2021)

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**Ditton**  
Aylesford South And Ditton

**25 SEPTEMBER 2025**

**TM/25/01319/PA**

**Location:** COBDOWN SPORTS GROUND STATION ROAD Ditton Aylesford

**Proposal:** Full planning permission for development at Cobdown Park to provide a football training centre (sui generis), comprising of the demolition and redevelopment of existing Clubhouse building, refurbishment of existing Academy building; demolition of ancillary buildings and structures across the Site; provision of new grounds maintenance building and service area; refurbishment of existing pavilion building to provide upgraded changing and kitchen facilities; provision of new upgraded grass football pitches and upgrade of existing synthetic surface; new areas for car and cycle parking; upgrade to existing sports lighting; boundary treatment and hard and soft landscaping and associated site infrastructure and site plant.

**Go to:** [Recommendation](#)

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## **1. Description of Proposal:**

1.1 The application relates to Cobdown Sports Ground, located in Ditton, and seeks full planning permission for the following works:

- Redevelopment and refurbishment of the existing Academy building.
- Demolition and redevelopment of the existing Clubhouse building.
- Refurbishment of Cobdown Park Pavilion (located in the northwest of the site).
- Demolition of existing ancillary buildings and structures across the site.
- Addition of a small single storey Security Gate House (at the entrance of the site).
- Provision of new Grounds Maintenance Building and service area (southwest area of the site).
- Upgrades to one full size grass pitch and two Academy pitches.
- Relaying of an existing artificial pitch (located in the west of the site).
- Creation of new car and cycle parking areas.
- Retention and refurbishment of Western Lawn Hut (located adjacent to the western boundary of the site).
- Incorporation of new landscaping across the site.
- Installation of boundary treatments including new site entrance arrangements.

### Clubhouse and Academy Buildings

1.2 The existing clubhouse, located towards the main entrance of the site, is proposed to be demolished and replaced by a modern, purpose built, first team and operations building. The new building is proposed to be connected to the academy building, situated to the rear, which is proposed to be refurbished.

### *Clubhouse Building*

1.3 The proposed new clubhouse is proposed to comprise two storeys and be sited approximately 8.5m further to the north and away from the main entrance than the

existing building proposed to be demolished. The proposed building is of a contemporary design, incorporating a 'butterfly' style roof form, large amounts of glazing and features a double height main entrance facing towards the southeast and entrance of the site. An entrance plaza is proposed to the south of the entrance to the proposed clubhouse building.

- 1.4 The proposal seeks to use high quality contemporary materials and external finishes and includes profiled metal rainscreen panels, composite panel cladding in white and pale grey, curtain wall glazing with light grey metal window frames, precast concrete, white textured split face block, integrated planting and render finishing in white and pale grey.
- 1.5 The ground floor of the proposed building is to comprise a lobby/reception space, changing and locker rooms, a laundry room, office and meeting rooms, treatment rooms, a gym and pool, sauna and hydrotherapy facilities. Separate first team and deliveries/service entrances are proposed on the south facing elevation. In addition, an entrance is proposed on the west facing elevation leading into the gym and recovery areas.
- 1.6 The proposed first floor level is of a reduced footprint to that of the ground floor. It proposes to provide a dining room and kitchen, players' lounge, an open plan office space, a media suite, meeting/event spaces/rooms and a small number of private offices.
- 1.7 The below table (Table 1) provides a summary of the proposed clubhouse along with a brief comparison against that of the existing building it seeks to replace.

Table 1: Existing and Proposed Clubhouse Building

|            | Existing | Proposed |
|------------|----------|----------|
| Max Height | 9.2m     | 8.3m     |
| Max Width  | 26.0m    | 65.0m    |
| Max Depth  | 21.5m    | 50.0m    |
| Floorspace | 732sqm   | 3,024sqm |

#### *Academy Building*

- 1.8 The existing academy building is a separate building situated to the rear (north) of the existing clubhouse building. The proposed development seeks to refurbish the academy building along with linking the building to the new clubhouse building. The academy building is proposed to be finished in the same materials as the clubhouse and together are proposed to form the 'Performance Campus Budling'.
- 1.9 The ground floor is proposed to primarily comprise the academy changing rooms and facilities. An access is proposed in the east facing elevation to provide access to the proposed academy pitches. The first floor is proposed to host education rooms, coach changing rooms, a meeting room and a flexible space.

#### Cobdown Park Pavilion

- 1.10 The pavilion is a single storey timber structure located in the northwest of the site and adjacent to the north of an existing artificial pitch (proposed to be upgraded as part of this application). The proposed development seeks to refurbish the pavilion to provide upgraded facilities. The pavilion is to continue to host changing rooms, storeroom and kitchen/meeting area. No extensions are proposed, but a decking area is proposed to the south.

Western Lawn Hut, Ancillary Buildings and Structures

- 1.11 Four single storey prefabricated buildings located to the rear and north of the existing academy building are proposed to be removed from the site. A dilapidated single storey sports pavilion located adjacent to the north boundary of the site is also proposed to be removed along with a timber shed lean to adjacent to Cobdown Park Pavilion. In addition, the existing Public Right of Way (MR492) surfacing and fencing/concrete wall is proposed to be cleared from the site.
- 1.12 A small section of the existing wall which runs along the south boundary of the site and adjacent to London Road (A20) is proposed to be partially removed to allow for the creation of a diverted Public Right of Way access/ egress (width 2m) with a new matching pier to the other side of the path proposed to be installed.
- 1.13 The 'Western Lawn Hut', a small single storey open sided brick structure/shelter, located adjacent to the west boundary of the site is proposed to be retained, repaired and refurbished as part of the proposals. The structure is proposed to provide a small, sheltered seating area.

Security Gate House

- 1.14 A single storey security gate house structure is proposed to be situated adjacent to the sites entrance point along with the addition of vehicle barriers and pedestrian access gates (cantilever sliding security gate) to provide controlled access to the proposed facilities and the neighbouring businesses and residents which currently utilise the entrance and internal driveway. This proposed structure is summarised in the below table.

Table 2: Proposed Security Gate House

|            | Proposed |
|------------|----------|
| Max Height | 3.0m     |
| Max Width  | 5.2m     |
| Max Depth  | 4.0m     |
| Floorspace | 15sqm    |

Grounds Maintenance Building

- 1.15 A single storey building and area is proposed to be located to the south of the western car park and towards the southern boundary of the application site. The building is proposed to provide welfare facilities for the ground's maintenance team and a secure storage space for plant and machinery. The service area is proposed to

allow for pitch maintenance vehicles and bulk material handling associated with the care of the sports surfaces and facility.

- 1.16 The building is proposed to be finished in horizontal lapped timber (painted black), with a profiled metal roof in dark grey colour with rainwater goods to match. The building is proposed to be securely fenced and screened with hedging and planting. The below table (Table 3) provides a summary of the proposed building.

Table 3: Proposed Ground Maintenance Building

|            | Proposed |
|------------|----------|
| Max Height | 5.3m     |
| Max Width  | 20.0m    |
| Max Depth  | 12.1m    |
| Floorspace | 178sqm   |

#### Pitch Upgrades and Alterations

- 1.17 The application seeks to clarify the proposed pitch arrangements and layouts in the east and north of the site. Also proposed is the upgrading of three pitches in these parts of the site by excavation and relaying the top surface and installing lateral drains feeding to a perimeter collector drain.

#### Artificial Pitch

- 1.18 An existing synthetic pitch located in the west of the site, a sand filled surfaced pitch, is proposed to be upgraded to a modern 3G football pitch. The pitch is to remain the same size and retain the existing perimeter fencing. The existing sports lights are proposed to be upgraded to utilise more current lighting technology to be more targeted, efficient and have less light spill. The hours of use are also proposed to be reduced from 22:00 (with a 30-minute buffer) to 21:00 (with a 30-minute buffer).
- 1.19 The upgraded pitch is proposed to support the academy as well as the local community on a managed basis as part of the club's community initiatives. A parking area is also proposed to be created to the south of the upgraded pitch along with disabled parking spaces adjacent to Cobdown Park Pavillion.
- 1.20 To the west of the upgraded pitch an adjoining recreational area is proposed and includes benches and landscaped spaces for spectators when the pitch is in use for specific matches.

#### Access and Parking

- 1.21 The vehicular and pedestrian access point from Station Road is proposed to remain as existing, albeit with the addition of the proposed cantilever sliding security gate and security gate house/lodge. Access within the site will continue via the existing internal private access road, which runs from the main entrance along the southern boundary of the site before turning northwards and beyond the northwest of the site, providing access to a small number of commercial and residential properties.

- 1.22 A gate is proposed to be located on the main access road to the south-west of the First Team car park, which is proposed to provide dedicated managed access for vehicles and pedestrians, ensuring security continuity across the entire site. In addition, a gate is proposed at the north of the internal access road.
- 1.23 Pedestrian access to the site is proposed via a footway and pedestrian access gate at the existing access on Station Road. The access gate is proposed to be open during operational hours. Entry at all other times is proposed to be via an access control system.
- 1.24 A total of 143 car parking spaces are proposed to serve the development across three car parks. This includes the creation of a new parking area to the south of the artificial pitch in the west of the site, which is proposed to be upgraded as part of this application. EV charging points are proposed to be provided in accordance with Part S of the Building Regulations. A breakdown of the car parking is shown below table (Table 4).

Table 4: Car Parking Provisions

|                                                                                          | Existing  | Proposed                         |
|------------------------------------------------------------------------------------------|-----------|----------------------------------|
| First Team Car Park (located to the west of the proposed performance campus)             | 35        | 35                               |
| Eastern Car Park                                                                         | 50        | 48 (including 3 disabled spaces) |
| Proposed Western Car Park (to the south of the artificial pitch proposed to be upgraded) | 0         | 60 (including 4 disabled spaces) |
| <b>Total</b>                                                                             | <b>85</b> | <b>143</b>                       |

- 1.25 The existing eastern car park is presently occupied by South East Water for construction works ongoing to the northeast of the site. The proposed development seeks to upgrade and formalise this existing area of hardstanding to provide staff/academy car parking provisions. 3 motorcycle parking spaces are also proposed to be provided within this parking area.
- 1.26 A new parking area is proposed to be created in the west of the site and to the south of the artificial pitch which is proposed to be upgraded. These parking spaces are proposed for use by users of the community and academy on a managed basis. 56 spaces are proposed within this area along with a further 4 disabled spaces adjacent to Cobdown Park Pavillion.
- 1.27 An existing coach parking space is located on the access road to the south of the First Team car park, which is not proposed to be affected by this application.

- 1.28 Cycle parking is proposed to be accommodated within the eastern and western car parks. 18 medium-long term cycle parking spaces are proposed to be provided within a secure cycle shelter in the eastern car park and a further 8 short-medium term cycle parking spaces will be located at the western car park. One of the spaces within the western car park is designed for use by disabled cyclists. In addition, two short-medium term cycle parking spaces are proposed to be located adjacent to the eastern car park near to the main entrance of the proposed 'Performance Campus Budling', one of which is proposed to be designated for use by disabled cyclists.

#### Public Rights of Way

- 1.29 A designated Public Right of Way (MR492) presently runs across the eastern part of the site in a south-north direction from Station Road towards the north, beyond the M20 and towards Panattoni Park (Aylesford). The proposed development includes the diversion of this right of way. The proposed new right of way is proposed to enter the site from London Road (approximately 230m to the west of the existing entrance point) and run parallel with the existing internal driveway within the site in a northern direction before continuing at the top of the road right along Ditton Stream until it meets public footpath MR491.
- 1.30 The diversion is sought not only to facilitate the proposed configuration and layout of the proposed 'Performance Campus' but crucially to ensure the safety and privacy of the first team and academy players which is necessary to enable the development to be carried out. Ensuring the safety and wellbeing of the players is one of the key objectives for the Performance Campus which cannot be achieved with a public footpath running through the operational boundary.
- 1.31 The proposed diversion seeks to provide a significantly enhanced, safe and more attractive route through and across the site, which is shorter in distance to those walking northwards from the west of the site in comparison to existing arrangements.
- 1.32 Under the provisions of Section 257 of the Town and Country Planning Act (1990) which enables the diversion of a public footpath where it is necessary to enable a development to take place in accordance with planning permission an application is to be submitted to KCC (on behalf of TMBC) to seek the diversion of the existing public footpath (MR492).

#### Landscaping and Biodiversity

- 1.33 The proposed landscaping and ecological enhancements include:
- Planting of 90 native trees, to replace 33 proposed to be removed;
  - 0.08ha of native scrub and 0.5km of new hedgerows, strengthening ecological corridors;
  - Habitat features such as bug hotels, log piles and mammal access points in boundary zones;
  - Species-rich grassland and meadow planting integrated around pitches and car park verges;

- A 30-year habitat management plan and CEMP measures to protect nesting birds and bats during construction; and
- A riparian buffer along Ditton Stream with targeted tree and shrub planting.

1.34 BNG of at least 10% is proposed to be achieved within the site boundary, with a 10.25% uplift in habitat units, 762.24% in hedgerow units and 12.48% in watercourse units.

1.35 Along the western boundary of the site a new 1.2m high post and rail fence is proposed to provide a clear edge to the wider Cobdown Park site providing containment to the Cobdown Park site and restricting movement beyond except for those that live or work to the north.

#### Lighting

1.36 Low level lighting, bollards and column lights (<3m) are proposed to be used to illuminate key pedestrian and vehicular routes across the site, which proposes to include links between car parks, main entrances and pitches. No new lighting is proposed in the north-west corner of the site, where mature tree canopies provide potential for bat foraging and commuting route.

1.37 Existing sports lighting/floodlighting infrastructure for the two synthetic/artificial pitches at the site are proposed to be upgraded to utilise more current lighting technology and the hours of use reduced from 22:00 (with a 30-minute buffer) to 21:00 (with a 30-minute buffer).

#### Drainage

1.38 Surface water drainage is currently unmanaged, with runoff either infiltrating directly into the ground or ponding in low-lying areas before dissipating naturally. The proposed drainage strategy seeks to improve on the current surface water management and drainage arrangements at the site.

1.39 Car park areas are proposed to be drained using porous paving systems, providing attenuation and infiltration at source. Such systems are designed to accommodate runoff from the parking and access surfaces without the need for conventional pipework, reducing discharge rates and promoting groundwater recharge.

1.40 Landscaped and resurface areas are proposed to continue to allow for diffuse infiltration, replicating the existing natural drainage regime.

1.41 The proposed refurbished and built form and associated hard landscaping is proposed to be drained via a piped surface water network collecting from rainwater pipes and hardstanding, discharging into a geocellular soakaway tank. This feature is proposed to be located beneath the new car park east of the building footprint and is designed to accommodate critical storm events including climate change uplift.

1.42 Additional Sustainable Drainage Systems (SuDS) are drainage systems are proposed in the form of:

- Rainwater Harvesting - Rainwater falling on the pitches will be collected and stored in a rainwater harvesting tank. This water can then be reused for irrigation of the proposed pitch.
- Infiltration Systems - A below ground infiltration tank is proposed to discharge surface water runoff from the new building and east carpark.
- Filter Strips – Proposed drain to allow infiltration of surface water runoff from hardstanding carriageways.
- Attenuation Storage Tanks - Tanks are proposed as part of the infiltration feature to store water prior to infiltrating to ground.

1.43 The onsite drainage networks and SuDS are proposed to be privately managed and maintained for the lifetime of the development, to ensure they remain fit for purpose and function appropriately. A management company/operator are proposed to be appointed post-planning.

1.44 The public foul water system includes a 150mm diameter sewer located within the development boundary, running north from Station Road through the site. There is an existing private connection from the existing buildings discharging downstream into the public network. The condition of the existing foul network immediately adjacent and within the retained building is considered in a poor condition and as such it is proposed to install new plot drainage and reuse the connection to the public sewer only.

#### Energy and Sustainability

1.45 The proposed development uses a fabric-first approach, prioritising passive energy savings through high-performance insulation, glazing and airtightness. Mechanical and electrical systems have been selected for energy efficiency and operational reliability, with potential for future integration of renewable technologies such as solar PV. The proposal seeks to be fully compliant with the 2025 uplift to Part L of the Building Regulations and is embedding climate resilience through water-saving features, low-energy lighting and intelligent controls.

#### Employment

1.46 The proposed development is expected to generate an average of 30 FTE on site construction roles over the duration of construction (around 15 months). Off-site construction roles are expected to be in the region of 285 FTE jobs over the same construction period including approximately 155 offsite roles.

1.47 Once constructed has completed and the facilities are operational the proposals are adapted to generate approximately 50 FTE jobs on site (a net increase of 35). The employment opportunities created would be across a range of different sectors and skill levels including catering, ground, academy, community and maintenance staff.

Open Space

1.48 The proposed development would not result in a change of use or the loss of the open space designation at the site.

**2. Reason for reporting to Committee:**

2.1 Due to the strategic nature of the development.

**3. The Site:**

3.1 The application site forms part of Cobdown Park Sports Ground located to the north of London Road (A20) and northwest of Station Road within the defined urban area and settlement of Ditton. The full Cobdown Park site is approximately 11.17ha in size, with the application site comprising approximately 5.87ha. The site is occupied by the London City Lionesses, a professional women's football club and the only club in the Women's Super League that does not have a men's affiliate.

3.2 Cobdown Park Sports Ground presently comprises the following facilities:

- Clubhouse and Academy buildings (situated in the south of the site).
- Various single storey ancillary buildings and structures (located across the site).
- A timber pavilion (Cobdown Park Pavilion) (situated in the northwest of the site).
- 3 x 11 a-side football pitches (located within the central and eastern parts of the site).
- 2 x artificial floodlit pitches (situated within the north and west parts of the site).
- 2 x disused bowling greens (located in the west of the site).
- Managed grass surfaced areas (situated across the site).
- Areas of hardstanding and parking (located in the south of the site).

3.3 The site is accessed from Station Road, located along the south boundary of the site, where an internal roadway leads to two parking areas (one to the east and one to the west of the entrance). The two storey, brick built, Clubhouse and Academy buildings are situated to the immediate north of the main site entrance. The two disused bowling greens are located towards the west boundary of the wider site and to the north of those lies the single storey Cobdown Park Pavilion. To the north and northeast of the Clubhouse and Academy buildings lie the grass football pitches. To the east of the disused bowling greens lies one of the floodlit artificial pitches with the other being located towards the northern boundary of the wider site.

3.4 The red line of the application site includes the two main buildings (Clubhouse and Academy buildings, which host office space, dining, changing and gym facilities), one of the 11 a-side grass pitches (located towards the northwest corner of the site), the existing artificial pitch located in the west of the site, the two disused bowling greens, Cobdown Park Pavilion, a number of the ancillary buildings and structures and an existing car parking area (located to the east of the main entrance).

- 3.5 Outside of the red line of the application site, but within the wider Cobdown Park site, works have already been carried out/commenced to upgrade two of the 11 a-side grass football pitches along with the southern boundary to create a new parking area for the first team and club staff (under permissions 25/00081/PA and 25/01144/PA).
- 3.6 To the north of the wider Cobdown Park site lies a stream (Ditton Stream) running in a general east-west direction, four detached dwellings a small number of commercial premises including a building in use by the Kent Football Association. Further to the north lies the M20 and the Panattoni Park industrial estate. To the east of the application site lies Station Road which predominantly comprises two storey semi-detached dwellings. To the south lies Station Road and London Road and its associated dwellings. To the west of the wider site lies the Cobdown Farm Conservation Area which includes two Grade II Listed Buildings (Clifford Sheldon Club House and 578 And 580 London Road) and a small number of other residential dwellings. These buildings collectively form part of an historic farmstead. Further to the northwest of the application site lies the Grade II listed Finnish Olympic Sauna.
- 3.7 The access point into the application site also provides access via Cobdown Park Road for the residents of the dwelling's located to the northwest and southwest of the site, in addition to two commercial properties. Pedestrian access to the site can also be achieved via the vehicular access from Station Road. Two Public Right of Ways that run through the site, towards the east, referenced as Public Footpath MR491 and MR492.
- 3.8 Compounds are located within the northeast and southeast areas of the application site, which are owned and operated by South East Water and are not associated with this application.
- 3.9 Cobdown Park Sports Ground was acquired by the applicant (London City Lionesses) in June 2024 for sole use as their training ground facility and has been in operation at the site since then for training purposes only. Their matches are played at Bromley Football Club's site on Hayes Lane in Bromley. The application site was previously owned by Marpaul Holdings Limited (t/a K Sports), a private company who operated the site privately on a for-profit basis, with pitches available to hire and the bar and function room operating as the primary revenue stream. Prior to the sale of the Cobdown Park site to the present owner and occupier (London City Lionesses), use by any other clubs was ceased by the previous owners.

#### *Planning Constraints*

- 3.10 The following planning constraints relate to the application site and its surroundings:
- Archaeological Notification Area – some Palaeolithic potential.
  - AQMA A20 Ditton – located to the south of the site.
  - Cobdown Farm Ditton Conservation Areas – located to the southwest of the site.
  - Environment Agency Flood Zones 2 and 3a.
  - Grade II Listed Buildings:
    - o Finnish Olympic Sauna – located to the northwest of the site.
    - o Clifford Sheldon Club House – located to the west of the site.

- 578 And 580 London Road – located to the southwest of the site.
- War Memorial London Road – located to the south of the site.
- Ground Water Vulnerability Zone.
- Mineral Safeguarding – parts of the north and southwest of the site.
- Minerals and Waste Safeguarded Facilities 250m Buffer Zone – small part of the northwest corner of the site.
- Open Space to be protected.
- Public Rights of Way:
  - MR492 – running across the site in a south-north direction.
  - MR491 – running along the north boundary.
- Tree Preservation Orders – a small number primarily located in the more western parts of the site.
- Urban Area – Ditton.

#### 4. Planning History (relevant):

| Application No. | Proposal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Decision                           | Date     |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------|
| 25/01144/PA     | Re-laying of 1 no. grass pitch into a new hybrid football pitch with associated infrastructure, installation of internal and external boundary treatment, and associated hard and soft landscaping.                                                                                                                                                                                                                                                                                                                                                                                                                       | Approved                           | 28/08/25 |
| 25/01113/PA     | Non-Material Amendment to planning permission TM/23/01920/FL: Amend the approved plans list to allow for the reduction in the overall length of the fence, increase height from 1.8m to 2.4m and additional planting of a hedge screen.                                                                                                                                                                                                                                                                                                                                                                                   | Approved                           | 30/07/25 |
| 25/01068/PA     | Environmental Impact Assessment Screening Opinion under the Town and Country Planning (Environment Impact Assessment) Regulations 2017 (as amended) in relation to development at Cobdown Park to provide a football training centre, comprising of upgrades to existing grass and artificial football pitches and associated infrastructure, demolition and redevelopment of existing clubhouse building and refurbishment of existing Academy building, demolition of existing out buildings and refurbishment of existing Club building, upgraded car parking, grounds maintenance area, improved boundary treatments, | Screening Opinion EIA Not Required | 15/07/25 |

|             |                                                                                                                                                                                                                                                                                                                                                                                                  |           |          |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------|
|             | upgraded and new floodlighting, and hard and soft landscaping works.                                                                                                                                                                                                                                                                                                                             |           |          |
| 25/00081/PA | Proposed re-laying of 1 no. grass pitch into a new hybrid football pitch with associated infrastructure, installation of internal and external boundary treatment, demolition of existing outbuildings, associated hard and soft landscaping, to enable improvements to the internal access road and car park and creation of a new footpath and retrospective installation of external signage. | Approved  | 20/03/25 |
| 23/01920/FL | Install new 1.8m high weld mesh fencing to the perimeter of the site area known as Webbes Field.                                                                                                                                                                                                                                                                                                 | Approved  | 13/06/24 |
| 23/00599/FL | Installation of eight five-a-side and one seven-a-side football pitches with associated lighting, fencing, hardstanding and a pavilion                                                                                                                                                                                                                                                           | Refused   | 14/11/23 |
| 22/02133/FL | Installation of eight five-a-side and one seven-a-side football pitches with associated lighting, fencing, hardstanding and a pavilion.                                                                                                                                                                                                                                                          | Refused   | 23/02/23 |
| 17/02438/FL | Alterations to previously approved scheme (reference: TM/16/00955/FL) to provide 2 Squash courts and sports hall with view areas and associated changing room spaces.                                                                                                                                                                                                                            | Approved  | 05/12/19 |
| 17/02170/FL | Alterations to existing permission TM/16/00955/FL approved September 2016. Proposal for an extension to provide office space and an enlarged restaurant and dining area with pool rooms and viewing terrace.                                                                                                                                                                                     | Approved  | 20/09/19 |
| 16/03552/FL | Amendments to previously approved scheme (reference: TM/16/00955/FL) to provide additional changing room facilities and a team training room.                                                                                                                                                                                                                                                    | Approved  | 26/01/17 |
| 20/02445/FL | Erection of 6 No. dwellings including associated access road, car parking and landscaping                                                                                                                                                                                                                                                                                                        | Withdrawn | 22/12/20 |
| 19/02004/FL | Erection of 6 No. dwellings including associated access road, car parking and landscaping                                                                                                                                                                                                                                                                                                        | Withdrawn | 16/10/19 |
| 16/00955/FL | 1. An extension and refurbishment to the existing clubhouse building to provide for a higher standard of social and function space and 2 teaching                                                                                                                                                                                                                                                | Approved  | 06/09/16 |

|                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          |          |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------|
|                                                                          | rooms. 2. An extension and refurbishment of the existing squash and gym building to provide a further 3 squash courts and wet and dry changing rooms as well and a gym space and dance studio. 3. A new build changing room block to provide changing facilities for 4 teams and associated officials. As well as spectator toilets and a kitchen space with serving hatch. 4. Provision of 2 3G pitches on the existing sports field.                                                            |          |          |
| <i>South East Water</i>                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          |          |
| 24/01127/PA (to the north of the application site and Ditton Stream)     | Installation of a new 'electrical hub' building and 1 no. new kiosk within Area C: Borehole 7 of South East Water's Butler Water Treatment Works.                                                                                                                                                                                                                                                                                                                                                 | Approved | 14/01/25 |
| 24/01220/PA (north east of the application site)                         | Installation of 2no. raised kiosks (one wet kiosk and one dry kiosk) at the proposed Borehole 10 site, enclosed within perimeter palisade fencing, 1.8m high and accessed via a 6m wide gate. 5m wide permeable stone access road from the compound to the highway and a 1.2m high galvanised steel gate on entrance to field. The kiosks are required to house Borehole as well as to house and protect the Motor Control Centre (MCC) equipment associated with the operations of the borehole. | Approved | 14/01/25 |
| 24/01852/PA (to the east of the site entrance)                           | Non-Material Amendment to planning permission TM/24/01071/PA - a minor amendment to the site layout to allow each kiosk to have its own plinth and access stairs                                                                                                                                                                                                                                                                                                                                  | Approved | 16/12/24 |
| 24/01071/PA (to the east of the site entrance)                           | The installation of 2no. raised kiosks (one wet kiosk to house the borehole headwork and one dry kiosk to house the telemetry, instrument and control equipment) at the proposed Borehole 9 site, which will be enclosed within perimeter palisade fencing, 1.8m high and accessed via a 5m wide gate.                                                                                                                                                                                            | Approved | 13/09/24 |
| <i>Cobdown House (located to the north east of the application site)</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          |          |
| 25/00997/PA                                                              | Section 73 application to Vary Condition 2 (plans list) of planning permission TM/24/01784/PA                                                                                                                                                                                                                                                                                                                                                                                                     | Approved | 28/07/25 |

|                                                                                                             |                                                                                                                                                                                                                                          |                            |                        |
|-------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------------------|
|                                                                                                             | (Refurbishment and extension of existing commercial office space and car park) to allow an update to approved drawings to accommodate some minor material amendments.                                                                    |                            |                        |
| 24/01784/PA                                                                                                 | Refurbishment and extension of existing commercial office space and car park                                                                                                                                                             | Approved                   | 06/02/25               |
| <i>Development Site South and West of Cobdown House (located to the north east of the application site)</i> |                                                                                                                                                                                                                                          |                            |                        |
| 24/00408/PA                                                                                                 | Residential redevelopment of the site, to provide 9 dwellinghouses, incorporating parking provision, private amenity space and biodiversity enhancements                                                                                 | Withdrawn                  | 10/07/24               |
| <i>Cobdown Lodge (to the south of the application site and to the north of London Road)</i>                 |                                                                                                                                                                                                                                          |                            |                        |
| 22/00196/FL                                                                                                 | Extension, alteration to roof and sub-division into two dwellings                                                                                                                                                                        | Approved                   | 04/07/22               |
| 21/00205/FL                                                                                                 | Demolition of existing dwelling and erection of 2 x 1 bedroom flats and 4 x 2 bedroom flats within new residential building. Creation of 8 parking spaces, cycle parking and refuse storage areas. Associated hard and soft landscaping  | Application Withdrawn      | 12/03/21               |
| 19/02900/FL                                                                                                 | Demolition of existing dwelling and erection of 3 x 1 bedroom flats and 6 x 2 bedroom flats within new residential building. Creation of 12 parking spaces, cycle parking and refuse storage areas. Associated hard and soft landscaping | Refused (Appeal Dismissed) | 31/01/20<br>(28/10/20) |
| 19/01053/FL                                                                                                 | Extension, alteration to roof and sub-division into two dwellings                                                                                                                                                                        | Approved                   | 13/09/19               |
| 19/00590/FL                                                                                                 | Ground floor extensions and alteration to roof to provide first floor accommodation                                                                                                                                                      | Approved                   | 23/04/19               |
| <i>Waste Land Parcel Northeast of 15, Station Road (to the east of the site entrance)</i>                   |                                                                                                                                                                                                                                          |                            |                        |
| 25/00468/PA                                                                                                 | Outline Application: All matters reserved for proposed construction of a detached three- bedroom house                                                                                                                                   | Withdrawn                  | 27/08/25               |
| <i>Land Parcel Northeast Of 15 Station Road (to the south of the site and north of Station Road)</i>        |                                                                                                                                                                                                                                          |                            |                        |
| 18/00922/FL                                                                                                 | Proposed two semi-detached houses                                                                                                                                                                                                        | Approved                   | 14/08/18               |

\* The above history only includes the most recent applications and those which are considered most relevant to this application.

- 4.1 Application 25/00081/PA granted consent for the re-laying of the grass pitch located adjacent to the existing Academy and Clubhouse buildings into a new hybrid football pitch, along with associated infrastructure installation, the demolition of existing

outbuildings, associated hard and soft landscaping and the creation of a new footpath. The works to this pitch were completed in July 2025 enabling the First Team to commence their pre-season training for the new football season in July 2025. This pitch is situated outside of the red line of this application.

4.2 Application 25/01144/PA granted consent for the relaying of a grass pitch in the eastern field/part of the site into a new hybrid football pitch, with the associated installation of internal and external boundary treatment and associated hard and soft landscaping. Works are anticipated to commence imminently. This pitch is situated outside of the red line of this application.

4.3 Application 16/00955/FL granted consent for:

1. An extension and refurbishment to the existing clubhouse building to provide for a higher standard of social and function space and 2 teaching rooms.
2. An extension and refurbishment of the existing squash and gym building to provide a further 3 squash courts and wet and dry changing rooms as well and a gym space and dance studio.
3. A new build changing room block to provide changing facilities for 4 teams and associated officials. As well as spectator toilets and a kitchen space with serving hatch. and
4. Provision of 2 3G pitches on the existing sports field.

4.4 Condition 14 of this permission stated:

*'The use of the development hereby approved shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the artificial grass pitches, clubhouse building, squash and gym building and changing room block and remaining playing field and include details of pricing policy, hours of use, access by non-members, management responsibilities and a mechanism for review [and any other aspects which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facility]. The development shall not be used at any time other than in strict compliance with the approved agreement.'*

*Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport.'*

4.5 This condition was not discharged by the then applicants/operators and therefore there has been no community use agreement in place at the site. The site is now under new ownership and is operating as a private sports facility. There are therefore no planning controls in place to ensure certain sports are played at this privately owned site at this time.

**5. Consultees:**

Ditton Parish Council – No objection

- 5.1 (10/09/25) Ditton Parish Council have considered further the above application and additional observations thereon are as follows:
- 5.2 Whilst not directly linked to the application we are aware of footpath (MR492/MR491) at the North East of the grounds is liable for flooding. We have not seen any planned improvements to the site that will affect the footpath in terms of avoiding flooding.
- 5.3 Regarding the proposed movement of the footpath – it is not clear if this will have lighting covering this path on the site – whilst the current one has no direct lighting – we are concerned the change in path design could encourage more to use it and the risks after dusk this could have.
- 5.4 (02/09/25) Ditton Parish Council is in support of the plans. The development of a facility, versus the potential risk of a large housing development has also introduced a large organisation that are looking to modernise existing facilities and bring the site to a level unseen in Kent.
- 5.5 The organisation has seen rapid promotion to the top level of football – and the facilities need to match the ambitions of a growing team.
- 5.6 We do have the following points to raise:
- The new glass structure – it is not clear from the design if there is a risk to the houses on Station Road would face increase light pollution at night as the building will contain significantly more windows than the current design.
  - The plans for a gated entrance from Station Road suggest restriction of access for Sheldon Court and Cobdown Park. It would affect the residents and all supporting vehicles (such as deliveries). It is not clear how their access would be maintained – particularly in unsociable hours or periods (such as Christmas). It would also affect businesses on the site not linked such as the Kent FA. We are also concerned about the emergency vehicle access not being impeded by the gates.
  - We are not clear if the new entrance on London Road is wide enough for vehicles (particularly emergency vehicles) accessing the houses at the back of the site. If it is not – there is a risk of existing properties not having clear access. If it is via the new gate – how are residents going to get in and out (and visitors and service vehicles). How will it be accessible outside normal working hours and at key dates such as Christmas. If London Road is not for vehicles is the 2m gap too wide – as it is in line with a bridleway and not a general footpath.
  - The community pitch is to be commended. There is a concern what entrance they would be required to use – and if this could increase traffic issues off Station Road. It is not clear if community use is given – where parking will be and whether 83 parking spaces on site is enough if this grows to be able to fill the viewing areas. Or if it expands to ‘tournament style’ events.

- We request the Station Road entrance has a keep clear box to allow traffic to move in and out of the site.
- We have no issues on the footpath development – the new path will provide the continued use of the footpath on the outskirts of the site but provides important secure boundary of the development.
- The existing lighting of the area is not excessive or risking any issues to the M20 traffic in the evening being distracted
- We commend the building design to reduce energy usage. We are surprised there has not been a focus on solar panelling on the roofs to help with the energy usage as well.
- Any new parking is requested to be designed to be porous to reduce flooding risk further.
- We would ask construction traffic is restricted to only enter the site via London Road – Station Road rather than using Station Road in to Aylesford to avoid traffic issues on a residential road.
- We would ask that there is suitable cleaning facilities to make sure vehicles do not bring mud on to the main A20.
- We would ask for restrictions of construction work to be after 8am to avoid increasing traffic during the school run. We would ask there is a restriction of site traffic at 14.30 – 15.30 to avoid traffic risk linked to local schools emptying.

Aylesford Parish Council – No objection

5.7 (03/09/25) No objection.

National Highways – No objection (recommend conditions)

5.8 (12/09/25) Recommend that conditions should be attached to any planning permission that may be granted.

5.9 Our response dated 3 September 2025 set out a number of matters needing action and/or clarification. We have worked with the applicant and can now provide this update.

5.10 Hard and soft landscaping - Fencing – we note the additional/repaired/replacement fencing proposals surrounding the proposed main site itself, and we have no comments/ objections to them. However, given the amended footpath routing, and the potential for the site to attract onlookers etc, we would wish to ensure that the fencing between the footpath and the M20 is sufficient to ensure that people/pets etc cannot stray onto the motorway/ NH land. Even if it is suggested that this land is outside of the site edged red, it would still be within the site edged blue and/or an off-site matter but importantly is a matter directly related to the implications arising from the proposed use, and therefore the matter needs to be addressed. Therefore details (text/ drawings as appropriate) should be provided on this point.

5.11 Update: the applicant confirms they are content to accept a condition requiring an assessment of the existing boundary and then repairs/replacement/augmentation as

required to ensure that people etc cannot stray from the applicant's land/ the footpath onto the SRN.

5.12 A condition is provided below for this purpose.

5.13 Structures - we note the Proposed Site Plan – Infrastructure Drawing (see extracts below) includes proposals for 5m tall Ball-Stop Fencing. To safeguard the SRN from errant balls (per se and given that the current vegetation cannot be relied upon for this particular purpose), the fencing should be extended for the full length of Pitch AC1 northern boundary and continue for a minimum distance of 30m along its western boundary running southwards from the north-west corner. Therefore details/ updates (text/ drawings as appropriate) should be provided on this point.

5.14 Update: the applicant has confirmed they are willing to install the required additional Ball-Stop fencing.

5.15 Lighting - we note the Lighting Impact Assessment by Tetra Tech dated August 2025. To ensure the safety of the SRN we need certainty that any lighting for/from adjacent land uses will not cause any glint/glare/dazzle/distraction to SRN users. The LIA appears not to have considered the SRN as a receptor and hence not assessed any potential implications of the lighting regime for the site on the SRN. Therefore details (text/ drawings as appropriate) should be provided on this point.

5.16 Update a revised lighting report has been submitted. We are now content that the SRN has been appropriately taken into account and that the proposed site lighting will not unacceptably impact on the safety of the SRN. This matter is therefore concluded.

5.17 Noise and any acoustic measures – for the avoidance of doubt, we have no comments on these aspects of the proposals.

5.18 Geotech – from our review of the documentation submitted, we have not been able to discern whether there will be any material changes in levels across the site. If there are to be, we would need to understand the implications for site, for example, with regards drainage. Therefore details (text/ drawings as appropriate) should be provided on this point.

5.19 Update: the applicant has confirmed there will be no material changes in levels across the site such that they would impact on the SRN. This matter is therefore concluded.

5.20 Drainage – the Ditton Stream runs alongside the site that drains into it. In the past, the silting out of soluble chalk in the culvert, including the pipe under the M20, has caused the culvert/ pipe to become blocked. We therefore need to ensure the any changes to the drainage regime for the Cobdown site does not create flow/silting issues. We note that under consents 25/0081/PA and 25/01144/PA, KCC Flood and

Water Management led on discussions and the imposition of appropriate conditions. We are content that they lead with regards this application, but we request sight of the final KCC FWM representations and recommended conditions to ensure that they cover all matters of relevance to National Highways.

- 5.21 Update: based on updated information, we are now content to leave this matter to KCC FWM.

*Overall Conclusion*

- 5.22 Based on updated information we are now able to conclude, that subject to the imposition of conditions (see below) on any consent granted, it has been demonstrated that the proposed development would not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in national transport and planning policy in DfT Circular 01/2022 and MHCLG NPPF 2024).
- 5.23 (03/09/25) Recommend that planning permission not be granted for a specified period.
- 5.24 We have reviewed the application and the submitted supporting documents from the SRN perspective. The SRN in the vicinity of the site comprises M20. The nearest junctions are M20J4 and M20J5. However, the M20 runs along the northern boundary/close to the site.
- 5.25 We will be concerned with proposals that have the potential to impact on the safe, reliable and/or efficient operation of the SRN (the tests set out in DfT C1/22 and MHCLG NPPF2024), by virtue of
- a) The traffic attracted to, generated by or rerouted as a result of proposals and/or
  - b) the construction, operation or maintenance of a site adjacent to or in close proximity to the SRN.

- 5.26 With regards (a) we note the following

- dha have produced a Transport Assessment dated August 2025
- we are content to leave any local road network methodological and other related details to KCC highways to lead on
- regardless of whether any discussions lead to changes to the TA we are content that from an SRN perspective the basic level of traffic attracted to, generated by or rerouted as a result of proposals has been reasonably assessed. Given the likely SRN trip generation/ distribution we are content that it would not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in national transport and planning policy in DfT Circular 01/2022 and MHCLG NPPF 2024).
- Therefore, we have no further requirements in respect of traffic

- 5.27 With regards (b) we note the following

- When assessing any site that lies adjacent/close to the SRN we consider, inter alia, the following matters, all related to the need to safeguard the safety, reliability and operation of the SRN
  - Hard and soft landscaping (fencing/ paving/ planting)
  - Structures (bunds/retaining walls etc)
  - Lighting
  - Noise and any acoustic measures
  - Geotech
  - Drainage
- In this context we have the following additional requirements

5.28 Hard Landscaping – we have no general comments or objections, save for the specific matters raised below.

5.29 Soft Landscaping – we have no general comments or objections, save for highlighting the need for the applicant and any future operator to ensure the proper notifications and procedures are followed when carrying out any vegetation maintenance in the vicinity of the M20 boundary. No work or workers can be on, under or over the SRN/NH assets without our agreement.

5.30 Fencing – we note the additional/repaired/replacement fencing proposals surrounding the proposed main site itself, and we have no comments/ objections to them. However, given the amended footpath routing, and the potential for the site to attract onlookers etc, we would wish to ensure that the fencing between the footpath and the M20 is sufficient to ensure that people/pets etc cannot stray onto the motorway/ NH land. Even if it is suggested that this land is outside of the site edged red, it would still be within the site edged blue and/or an off-site matter but importantly is a matter directly related to the implications arising from the proposed use, and therefore the matter needs to be addressed. Therefore details (text/ drawings as appropriate) should be provided on this point.

5.31 Structures – we note the Proposed Site Plan – Infrastructure Drawing (see extracts below) includes proposals for 5m tall Ball-Stop Fencing. To safeguard the SRN from errant balls (per se and given that the current vegetation cannot be relied upon for this particular purpose), the fencing should be extended for the full length of Pitch AC1 northern boundary and continue for a minimum distance of 30m along its western boundary running southwards from the north-west corner. Therefore details/ updates (text/ drawings as appropriate) should be provided on this point.

5.32 Lighting – we note the Lighting Impact Assessment by Tetra Tech dated August 2025. To ensure the safety of the SRN we need certainty that any lighting for/from adjacent land uses will not cause any glint/glare/dazzle/distraction to SRN users. The LIA appears not to have considered the SRN as a receptor and hence not assessed any potential implications of the lighting regime for the site on the SRN. Therefore details (text/ drawings as appropriate) should be provided on this point.

- 5.33 Noise and any acoustic measures – for the avoidance of doubt, we have no comments on these aspects of the proposals.
- 5.34 Geotech – from our review of the documentation submitted, we have not been able to discern whether there will be any material changes in levels across the site. If there are to be, we would need to understand the implications for site, for example, with regards drainage. Therefore details (text/ drawings as appropriate) should be provided on this point.
- 5.35 Drainage – the Ditton Stream runs alongside the site that drains into it. In the past, the silting out of soluble chalk in the culvert, including the pipe under the M20, has caused the culvert/ pipe to become blocked. We therefore need to ensure the any changes to the drainage regime for the Cobdown site does not create flow/silting issues. We note that under consents 25/0081/PA and 25/01144/PA, KCC Flood and Water Management led on discussions and the imposition of appropriate conditions. We are content that they lead with regards this application, but we request sight of the final KCC FWM representations and recommended conditions to ensure that they cover all matters of relevance to National Highways.
- 5.36 Overall Conclusion – While National highways have no objection to the principle of the development, we have identified various matters requiring the submission of further evidence, amendments and/or clarifications.

Environment Agency – No objection

- 5.37 (28/08/25) No objection to the proposal subject to conditions.
- 5.38 We have no objection in principle to the proposed development, but the FRA does not provide sufficient information to demonstrate flood risk can be safely managed without increasing flood risk elsewhere.
- 5.39 Section 1.2.1 confirms the proposals considered by this FRA include the following:
- Resurfacing and landscaping;
  - a building extension;
  - refurbishment of an existing building and,
  - improvements to access, car parking and drainage infrastructure.
- 5.40 However, section 1.3.2 contradicts this by suggesting the construction of a new single storey team building. This should be clarified and further detail on the “use” provided, especially as section 3.1.4 implies the finished Floor Level (FFL) of the new building is proposed to be lower than the design flood level. If this is a new building, unless the use is to be a changing facility or similar with tiled flooring throughout, the opportunity should be taken to raise the FFL to above the design flood level, prevent internal flooding and subsequent remedial costs.

- 5.41 3.1.6 also suggests a small displacement of floodwater. Whilst this may be negligible, it is not acceptable to suggest it can be accommodated elsewhere without providing evidence for this. Detail should be provided to demonstrate floodwater will not be displaced to a vulnerable area. Furthermore, it has already been proposed to undertake land re-profiling elsewhere which could displace floodwater. For this reason, we have previously recommended conditions.

Natural England – No objection

- 5.42 (28/08/25) Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Active Travel England – No objection

- 5.43 (15/08/25) Refer to standing advice  
(<https://www.gov.uk/government/publications/active-travel-englandsustainable-development-advice-notes>)

Sport England – No objection (subject to Grampian conditions)

- 5.44 (29/08/25) Sport England raises no objection to this application as it is considered to meet exceptions. 2, 3, 4 and 5 of our Playing Fields Policy and to accord with Paragraph 104 of the National Planning Policy Framework (NPPF), subject to conditions set out below.

*History/Pre-application discussions:*

- 5.45 Sport England were invited to pre-consultation discussions with the applicant's design team, including one on site where a representative of the Tonbridge and Malling Borough Council's planning department was present.
- 5.46 Sport England is very supportive of the principles of the redevelopment of site both for the professional game, through the London Lionesses and the community women's game.
- 5.47 However, Sport England was disappointed on how the Hockey club and croquet club have been dealt with. Both could have remained on site for at least the past season or longer. It was also disappointing to see the number of unanswered emails the hockey club sent to the London Lionesses. It was also disappointing see the hockey pitch used as a car park, on my site visit, when there was plenty of land which could have been used for parking.
- 5.48 This was discussed at length at all the meetings between Sport England and the London Lionesses and their consultants. The original plan prior to the Lionesses acquisition of the site was to create a second hockey pitch at the K-Sports site. Currently the hockey club is investigating Kings Hill as a new home which can accommodate 2 hockey AGPs as well the football need for another 3G AGP. Funding is an issue. Normally in situations where club is displaced, by another user, there is

an expectation, that the new users will pay for the new facilities for the displaced user.

- 5.49 Sport England made it clear, that in order to avoid an objection for the conversion of the hockey AGP, and the loss of the croquet courts Sport England would have to see that their replacement and being operational prior to the conversion and loss or would require a Grampian Condition. Whilst there are no current proposals formally submit for replace facilities, we understand these will be coming forward in due course, and therefore the Grampian condition will be reasonable to address any loss of facilities.
- 5.50 It is still difficult to understand why the club cannot stay on site. Their court is only 32m x 25.6m and the plan for the croquet courts it is to turn them into areas to meet the biodiversity net gain requirements. The BNG could be accommodated elsewhere on the site, not on the courts. The refurbished pavilion could be shared with the community football users.
- 5.51 However, if the London Lionesses are unwilling to allow the Medway croquet club back on the site, then Sport England requires a condition to ensure that the land that was used by croquet is not developed until the club has a new site locally and is operational.
- 5.52 We also discussed the need for a community use agreement, (CUA) for access to the sports lit 3G AGP and suggested that it should be between the applicants and Kent Football Association, (KFA). (Sport England subsequently discussed with KFA who were happy to be signatory to a CUA).

*Assessment against Sport England's Playing Fields Policy and NPPF:*

- 5.53 There are three elements which are relevant to Sport England:
1. The provision of the facilities associated with the professional football club.
  2. The sports lit artificial grass pitch conversion.
  3. The provision of the bio-diversity net gain on the croquet courts.

*Playing Pitch Strategy:*

- 5.54 Tonbridge and Malling Borough Council's Playing Pitch Strategy, (PPS) was published in June of this Year. We note that this is referenced in the consultant's planning statement. Croquet was not one of the sports that the PPS assessed. The PPS looked at Football, Cricket, Rugby Union, hockey, bowls, netball, athletics baseball and multi-use games areas. The PPS was not completed prior to the takeover of K-Sports site by the London Lioness and the Hockey section had to be rewritten due to the hockey being put off the site. The PPS also noted that there is a need for additional sports lit 3G AGPs to meet the demand from grass roots football.

*Consultations carried out by Sport England:*

- 5.55 Sport England carried out consultations with the affected national governing bodies who are impacted by the proposed development; Croquet England, (CE), England Hockey, (EH) and Kent Football Association/the Football Foundation, (KFA/FF). We are setting out their responses verbatim.

*Croquet England:*

- 5.56 'As far as I am aware, the Medway Croquet club has not yet found a new home having been kicked out last year with only 48 hours' notice. The nearest croquet club to where they were is in Tunbridge Wells which is over 20 miles away.'

*Sport England comments:*

- 5.57 While croquet was not in the PPS, it should not be set aside and forgotten. We believe replacement courts should be addressed though a Grampian condition, prior to the loss of the current court to bio-diversity net gain, (BNG).

*England Hockey:*

- 5.58 'England Hockey (EH) is concerned to note that the planning application makes no reference to the site's former use by K-Sports Hockey Club – a long-established, community-based club comprising three men's teams, three ladies' teams, and a growing junior section.
- 5.59 Following the sudden loss of its tenure, the club has been left without a home venue and is now required to travel outside of the borough to secure facilities for matches, training, junior development, and wider social activities. This represents a significant loss of sporting opportunity for residents of Tonbridge and Malling Borough, where the club had provided a valuable community outlet for many years. It is particularly disappointing that the application does not acknowledge the loss of a hockey playing pitch, nor does it propose any mitigation measures to ensure continuity of provision. The removal of the sand-dressed multi-sport artificial grass pitch, without reprovision, has a direct negative impact on the sustainability of K Sports Hockey Club and on access to community sport within the borough.
- 5.60 Over several months, EH (working alongside the hockey club) has attempted to engage constructively with the applicant to explore and agree a fair and reasonable mitigation package that would allow hockey to continue locally. Regrettably, no response has been received to these approaches.
- 5.61 In addition, EH is surprised and concerned to observe that the existing sand dressed pitch has been repurposed for use as car parking, as evidenced in the 2025 Google Earth imagery (see below). There is no evidence that an application for change of use has been submitted or approved. This is a highly regrettable outcome, as the pitch could have continued to be used by K-Sports Hockey Club, pending the outcome of a longer-term solution. Instead, the club has been placed in the difficult position of having to make significant alternative arrangements simply to ensure its league fixtures could proceed in line with EH competition requirements.

- 5.62 England Hockey objects to the proposed development at K-Sports Cobdown.
- 5.63 EH strongly advises that the applicant engages directly with both the Club and the National Governing Body (EH) to agree a fair and deliverable mitigation package. This must include the provision of a full-size, sport lit, replacement sand dressed hockey pitch, located within the Swale local authority area, and agreed with the hockey club, together with appropriate ancillary facilities.
- 5.64 Such provision would represent a genuine like-for-like reprovision, recognising the loss of K-Sports facilities to hockey because of the changes made by the new owners and the ongoing development of the site.
- 5.65 Furthermore, EH strongly recommends that a planning condition is applied to ensure that the existing sand-dressed artificial grass pitch (AGP) at K-Sports Cobdown is not removed or converted to a 3G surface until the agreed hockey mitigation has been fully delivered. This safeguard is essential to protect hockey provision within the borough and to secure the long-term future of the sport for the community.'

*Sport England comments:*

- 5.66 Sport England understands the position of the EH, however, we did set out position on the 1st of May 2025, when we shared with EH and the club, that a Grampian condition is used to prevent the redevelopment of the hockey pitch until a replacement pitch has been secured.

*Kent Football Association/the Football Foundation:*

- 5.67 'The planning statement includes the following reference with respect to former use of the site:
- 5.68 The Wider Site was acquired by the Applicant in June 2024 for sole use as their training ground facility and the Club have been in operation at the Site since then for training purposes only. Their matches are played at Bromley Football Club's site on Hayes Lane in Bromley. The Site was previously owned by Marpaul Holdings Limited (t/a K Sports), a private company who operated the Site privately on a for-profit basis, with pitches available to hire and the bar and function room operating as the primary revenue stream. It was used by a range of different clubs and sports on a temporary and informal basis.
- 5.69 Previous to the purchase of the site by LCL, it played host to 2 Step 6 teams, and to several youth and adult teams. All these teams have therefore now moved and have either reformed or play elsewhere within the community. The grass pitch and 3G (plus the hockey pitch used for football training) were lost for the purpose of community/grassroots activity, however Kent FA are working with LCL to develop a community agreement to allow community use, predominately aimed at female participation, the site will also help the county to develop coach and referee courses.

5.70 The replacement facilities proposed as part of this application are an improvement on existing provision and exceed the requirements of community football outlined within our general ancillary provision guidance. We therefore have no objection to the proposals'

*Sport England comments:*

5.71 There is a proven need for sports lit 3G AGPs in the area, and the proposed conversion of the hockey pitch to 3G would meet a need. Therefore, a community use condition between the London Lionesses and Kent FA would address this need.

*The Facilities for the sole use of the London Lionesses:*

5.72 We have assessed the area and facilities to be used by the professional club, and found them to be compliant our planning policies: In summary

- Redevelopment of existing Clubhouse building, refurbishment of existing Academy building; meets our planning policy exception 2.
- The provision of new grounds maintenance building and service area. meets our planning policy exception 2.
- The provision of new upgraded grass football pitches meets our planning policy exception 4.
- The new areas for car and cycle parking; upgrade to existing sports lighting; boundary treatment and hard and soft landscaping and associated site infrastructure and site plant meets our planning policy exceptions E2 and E3.

*The Facilities for the Community Football:*

5.73 The conversion of the sports lit hockey AGP to a sports lit 3G AGP. As mentioned above, there is a need for two hockey AGPs in the area, and the original wording in the draft PPS was that this one had to be protected and consideration of a second one being built on the site. This was supported by all the members of the steering group.

5.74 We note the need for a sport lit 3G AGP and accept the case which are set out in the application for this; however, it is the view of Sport England that the sports lit hockey pitch should be replaced and operational before the commencement of its conversion to 3G starts. Because the PPS identifies the need for the hockey pitch. As mentioned above this can be achieved via a Grampian condition.

5.75 There is lack of detail on the 3G conversion on containment, the recycling of the carpet at the of its life. We cannot find any reference to this in the application. This should be conditioned.

5.76 As the community 3G AGP is to be run separately by and large from the main campus, we would require a condition which would cover the management and maintenance of the AGP.

- 5.77 The conversion of the hockey pitch to a 3G AGP can be considered to meet our exception 5 subject to conditions.
- 5.78 The proposed refurbished pavilion doesn't meet the normal standards of pavilion associated with a 3G AGP, but it is a refurbishment and therefore is considered to meet our planning policy exception 2. Sport England would support a future application which brought the pavilion in line with the FF design guidance.
- 5.79 The proposed Bio-diversity Net Gain enhancements on the croquet courts could be considered to meet our planning policy exception E3 subject to a Grampian condition to replace the croquet courts prior to their development. This can be secured through the same condition as the hockey.

*Sport England's Position:*

- 5.80 On balance, while there are issues in relation to hockey and croquet that have not been formally addressed, we consider that the overall benefits outweigh the detriment caused and that the outstanding matters can be dealt with by way of planning condition to ensure that the scheme does not promote one sport to the detriment of another. Therefore, Sport England raises no objection to the application because it is considered to accord with exceptions 2, 3, 4 and 5 of our Playing Fields Policy and paragraph 104 of the NPPF.
- 5.81 The absence of an objection is subject to the conditions being imposed should the local planning authority (LPA) resolve to approve the application.

Southern Water – No objection

- 5.82 (15/08/25) The development site is not located within Southern Water's statutory area for water supply drainage services.

Kent Police – No objection

- 5.83 (03/09/25) I have attended a meeting with the planning/design team where we went through the current plans of the development. Our discussions mainly expanded on the perimeter of the development and the management processes including the use of the security hub. I had no issues or concerns during the meeting and I'm sure the planning/design team will be in touch again in due course.
- 5.84 (14/08/25) We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).
- 5.85 Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

- 5.86 There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.
- 5.87 Recommend the applicant follows SBD guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.
- 5.88 Kent Police identify detail recommendations for the layout and design of this scheme (set out within response letter).

Kent Fire and Rescue – No objection

- 5.89 (21/08/25) Upon review of the documents available on the planning portal, please ensure that emergency vehicle access to Performance campus building is in accordance with Table 15.1 of ADB, Vol 2. For the remaining proposed premises within the site masterplan, please ensure that emergency access routes are in accordance with Table 15.2 of ADB, Vol 2.
- 5.90 Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5 in greater detail.
- 5.91 Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Flood and Water Management – No objection

- 5.92 (03/09/25) It is proposed to manage the surface water through incorporating infiltration via permeable paving, a geocellular soakaway for roof drainage, and natural percolation across landscaped areas. whilst we have no objection to the proposals in principle at this stage we do have the following items to be addressed as part of the detailed design submission:
1. We would emphasize that additional ground investigation will be required within the location and proposed depths of the infiltrating features to support the use of infiltration. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltrate rate and demonstrate that any soakaway will have an appropriate half drain time.
  2. It is noted that groundwater monitoring of the standpipes installed is to be undertaken over the winter of 2025-2026, with the readings reported once

completed. We require for the results of this monitoring to be provided to confirm that a minimum of 1m separation is provided from the base of any infiltration feature and the ground water level.

3. Further to this we seek clarification as to how these areas will be protected from the Flood events as shown in the Concept drainage Strategy (Drawing number: LCLTC-LON-ZZ-EX-DR-C-000003, dated 25.07.25) in order to ensure that the capacity of the permeable paving and infiltration tank for the positively drained area is not impacted/ reduced.

5.93 Should the Local Planning Authority be minded to grant permission, we would recommend conditions are attached to any approval.

KCC Ecology – No objection

5.94 (10/09/25) We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative.

*Ecological Impact Assessment*

5.95 We are satisfied that a suitable sensitive lighting design and construction ecological/environmental management plan, secured by condition can effectively mitigate for impacts to protected and priority species. Suggested condition wording.

*Biodiversity Net Gain*

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

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

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

*Significant On-site Gains*

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

5.100 Non-significant enhancements are those whose loss will not significantly decrease the development's biodiversity value e.g., private gardens or container planting. These types of enhancements do not normally require maintenance provisions and

so no Habitat Management and Monitoring Plan, legal agreement or commitment to maintain them is required.

5.101 We consider the creation/enhancement of native hedgerow, watercourse enhancement, creation of modified grassland, urban trees, mixed scrub, and other neutral grassland to constitute significant on-site gains. Government guidance states: “The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage.”

5.102 It is our view that significant on-site gains should be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. Monitoring fees should be secured for significant on-site gains as these will be subject to 30 years of monitoring reports which will need to be reviewed by the LPA at their own cost.

5.103 Additionally, we recommend conditions for a habitat management and monitoring plan and monitoring reports to secure the significant on-site gains. We also recommend that the conditions secure the retention of trees and proposed retained watercourse. Although, the retention of existing habitat cannot count as on-site significant habitat, the retained habitats are recommended to be secured as well as the created and enhanced habitats as without the retained habitats the 10% biodiversity net gain would not be achieved. Further there are national and local policies in place to conserve biodiversity.

5.104 (09/09/25) We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Additional information to justify or update the baseline habitat classifications.

5.105 We recommend that the ecology impact assessment and biodiversity net gain assessment for the site be added to the public register.

KCC Minerals and Waste – No objection

5.106 (28/08/25) I have no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this planning application.

KCC Public Rights of Way – No objection

5.107 (27/08/25) I have no objection to the principle of the development, and it is good to see that the pre-application discussions regarding the management of the existing public footpaths (MR491 and MR492) were taken on board and are reflected in the application.

5.108 That said, although a diversion order can be applied for under the provisions of the Town and Country Planning Act 1990, there is no guarantee of success and the planning application, as made, would be unable to proceed were the path not to be successfully diverted.

5.109 Although the diversion is a separate legal process to the planning application, there is crossover between the two and each must accommodate the other. To that end, the following minimum requirements for the footpath should be noted and reflected within the planning application if it is a matter that requires planning permission:-

- The proposed new route must have a minimum width of 2.0m where the path is open or only fenced/hedged on one side or a minimum width of 2.5m where the path is fenced/hedged on both sides.
- No furniture, such as gates, bollards, etc is to be placed within the diverted public footpath as a consequence of the diversion order or planning permission. Should such furniture be required, there are separate powers contained within the Highways Act 1980 and it should be these powers that are utilised, separate to the planning permission.
- As the internal roads will be private and unadopted, the public footpath is the dominant right. To reflect this priority, points where the path crosses internal roads comprising a bound surface must take the form of a raised speed table so that pedestrians cross at grade and vehicles are forced to slow. The surface of the speed table should be colour contrasted with the approaching vehicular road or marked as a zebra crossing (however, please note that formal zebra crossing lighting is not required).
- I am happy with the proposed use of self-binding gravel for the section of the new path that runs along the northern edge of the site. However, I would wish to see a bound surface, preferably asphalt, for the section of path that will run north/south (subject to the separate application) and for the section between the car park and the A20 (subject to this application). In both these instances the use of these sections of path is more likely to be utilitarian than recreational and, as a result, there will be an increased maintenance burden placed on the County Council.

#### *Conditions*

5.110 The Public Rights of Way and Access Service requests that conditions are attached to any consent to address our objection to the application and to ensure that the development, should it receive consent, may progress.

#### KCC Highways and Transportation – No objection

5.111 (11/09/25) Kent County Council (KCC) Highways note that subsequent to this authority's initial response the applicant has provided a response note and additional personal injury collision (PIC) data. This information confirms the following:

5.112 That a policy compliant and acceptable level of cycle parking will be provided.

5.113 During the 5-year period between 1st April 2020 and 31st March 2025 53 collisions resulting in personal injury occurred across the study area. Of the 53 collisions that occurred 6 were classed as serious in severity, with the remaining 47 collisions classed as slight in severity. These collisions are spread evenly across the study area although clusters of collisions can be identified at nearby junctions, including New Hythe Lanes and Hall Roads junction with the A20, London Road

5.114 Review of the applicant's analysis confirms that neither the highway layout, or any defects within it were a contributory factor in any of the recorded collisions, with driver error, pedestrian error and/or a lack of driver concentration being the primary reasons for collisions. Common driver errors include failing to stop in time for stationary traffic, pulling out into the path of oncoming vehicles, contravening red traffic signals and driver intoxication. On this basis KCC Highways do not consider that the development will exacerbate any safety concerns associated with the existing highway layout.

*Summary and Recommendation*

5.115 No objection, subject to conditions

5.116 (08/09/25) KCC Highways wish to raise a holding objection to the proposal on the basis that the applicant should be required to provide the following additional information:

- Confirmation of how and where the 34 proposed cycle parking spaces would be provided.
- Submission of revised PIC analysis that is based upon the most up to date available data.

KCC Heritage – No objection

5.117 (10/09/25) The site of proposed redevelopment lies within the valley of the River Medway and is likely to contain river terrace and alluvial deposits, which have potential for Early Prehistoric remains. There are broad indications of Iron Age and Romano-British activity in the wider area but this seems to be an area with no notable number of medieval or post medieval farmsteads or small holdings. However, an Anglo-Saxon spearhead was located in Cobdown Wood to the north west. This may be an isolated site or it may be part of a wider Early Medieval cemetery.

5.118 The 1st Ed OS map highlights the location of Aylesford mill and its associated mill pond and leats. Although these seem to form the western boundary of the site, remains associated with this 19th century or earlier mill may survive on site. There are historic footpaths crossing the site, suggesting movement of people across the site for farming, industry or horticulture or just to utilise the river valley resources. Much of the later activity on this site has been the early 20th century sports facilities.

- 5.119 I note this application is supported by a Built Heritage Assessment by RPS with regard to the designated heritage assets nearby. This includes the Finnish Olympic Sauna for the 1948 Olympic Games and the clubhouse. The Sauna timber structure was moved several times and was moved to this location in 1957. The other one on the site itself is the Clifford Sheldon Club House which originally was a 19th century oast house, possibly associated with a 15th century hall-house (578 – 580 London Road), also listed and is located towards the SW corner of the site.
- 5.120 This application is also supported by an Archaeological DBA by RPS. Although the DBA is very brief, it does provide an acceptable baseline assessment of archaeological issues. I am not entirely in agreement with the Palaeolithic assessment given the site has not been thoroughly tested and lies adjacent to an ANA of high Palaeolithic potential to the north west and an ANA of moderate Palaeolithic potential to the south west. However, I accept that archaeological issues can be addressed through conditions and I recommend conditions are placed on any forthcoming consent.

TMBC Environmental Protection – No objection

- 5.121 (12/09/25) Construction Management Plan (CMP): The Applicant has submitted a revised CMP from their Consultant, Stace (their ref 250725 LCL TG\_Construction Management Plan Rev 03, dated September 2025). Para 4.2 has been amended to reflect the Council's Core Hours for such work, but it should be stressed that these hours include deliveries and collections to and from the site. Para 7.1 has been amended to state that open fires are prohibited. At para 7.12 a maximum site boundary noise limit for demolition/construction activities has been revised to 65db(A) [sic]. However, justification for this proposed level has still not been provided. I believe that this matter may be able to be dealt with via a suitably worded Condition requiring this information.
- 5.122 (01/09/25) Construction Management Plan (CMP) – The Applicant has submitted a CMP from their Consultant, Stace (their ref 250725 LCL TG\_Construction Management Plan Rev 01, dated July 2025). In the main I am content with this, but do have a few concerns: At para 4.2 the hours of proposed working are cited. These do not coincide with the Council's Core Hours for such activities. The Council's Core Hours are Mon-Fri 07:30-18:30, Sat 08:00-13:00, Sun & Bank Hols None at all. I would ask that the Applicant's proposed hours be amended to reflect these. At para 7.1 it is stated that open fires are NOT prohibited (my emphasis). I believe this to be a typo, but would ask for it to be amended for the avoidance of doubt to state that open fires are prohibited. At para 7.12 a maximum site boundary noise limit for demolition/construction activities has been proposed of 70db(A) [sic]. However, no justification for this proposed level has been provided and needs to be provided.
- 5.123 Noise Impact Assessment (NIA) – The Applicant has submitted an NIA from their Consultant, Logika (their ref 16091A-20-R02-03, dated 05/08/2025). The Assessment details measured existing background noise levels and predicted the impact of the use of one or more of the proposed pitches upon nearby Noise Sensitive Receptors

(NSRs). It has concluded that there will be a minimal impact upon some of the NSRs, but the majority will not experience a perceptible impact. I am content with the Assessment and have no further comments.

5.124 Noise – In light of the nature of the work, I would invite the Applicant to apply for a Prior Consent under Section 61 of the Control of Pollution Act 1974. The Applicant should be aware that the Council have 28-days within which to make a decision upon such an Application and so should factor this timescale (as a minimum) into their plans if they decide to apply.

5.125 Lighting Impact Assessment (LIA) – The Applicant has submitted an LIA from their Consultant, Tetra Tech (their ref 784-B075020, dated 06 August 2025). The Assessment details measured existing lighting levels and predicted the impact of the proposed new lighting scheme (principally for roadways and access to pitches). It has concluded that there will be no impact to surrounding residents. I am content with the Assessment and have no further comments.

5.126 Contaminated Land – The Phase I report presents the findings of a desk study and site walkover. It adequately reviews the history and environmental setting of the site. Made ground (as a product from previous phases of development/demolition) is considered to be a potential source of contamination, and as such an intrusive investigation is recommended.

5.127 The Ground Investigation Report presents the findings of an intrusive investigation. Significant contamination of the soils was not encountered and as such no remediation is required. Due to the site's location within an SPZ1 for groundwater protection, I would recommend consulting the EA.

5.128 As some made ground was encountered during the limited investigation works, I would recommend a condition should more be found during groundworks.

5.129 On the basis of available data and information, the site is not identified as a site of potential concern or any adjacent site.

5.130 To safeguard the situation in the event that significant deposits of made ground or indicators of potential contamination are discovered during development, I suggest conditions are imposed.

#### TMBC Economic Regeneration - Support

5.131 (19/08/25) I am happy to support this application. It will clearly bring a raft of socio-economic benefits to the local area in terms of job creation (both construction and operational), improved sports facilities that can be accessed by the local community as well as through putting the area 'on the map' for women's sports. With a range of other sporting facilities either being improved or scheduled for improvements - such as Buckmore Park, London Golf Club and our own leisure facilities in Larkfield and

Tonbridge – these proposals add a further dimension to the development of a vibrant sports cluster in the local area.

TMBC Leisure Services – No objection

5.132 (05/09/25) The submission addresses facility development at the site and builds on previously approved FT1 and submitted FT2 applications. In this regard the application enhances onsite facility provision and positively works towards the sites aspirations to become the London Lionesses Performance Campus as a centre of excellence for women's football. It is clear that the proposed provision is of exceptional high quality and representative of a team promoted to the Womens Super League at the end of the 2024/25 season. Whilst this high level of sporting facility is admired and its presence alone in the borough may in itself promote inspirational benefits for young women and girls in this sporting arena, it will also be critical that the facility engages with the local community and within the sport of football itself down to a grassroots level. It is therefore encouraging to read the Socio-Economic Benefits Statement and the proposals/aspirations within, including Academy and grassroots activities, though it will be essential that aspirations within this document are brought to fruition as some sections mention 'the potential to deliver...' and 'there is the opportunity...' The list of community engagement projects at 6.16 is noted and welcomed and again it will be essential that this is taken forward and enhanced in order to integrate this facility into the local and wider community. The application no longer offers the opportunity for the long-established Hockey and Croquet Clubs to use the site. These clubs are finding it exceptionally difficult to locate and fund alternative facilities for their future use and this matter is considered in the comments made by Sport England as a statutory consultee on this application. There is a deficiency of all weather hockey pitches in the borough identified within the Council's Playing Pitch Strategy.

TMBC Tree Officer – No objections

5.133 (12/09/25) No objection, subject to conditions.

Conservation Officer – No objection

5.134 Although this is a complex scheme, the proposed maintenance building and yard within the Cobdown Park West part of the application site are the only elements with potential to affect the significance of designated heritage assets in the vicinity. This assessment is therefore confined to the potential impact of those components on the adjacent conservation area and the listed buildings within it.

5.135 Significance of the designated heritage assets southwest of Cobdown Park West.

5.136 A Grade II listed, mid-19th century Oasthouse with Roundels is located just outside the southwestern boundary of the proposal site. The main two storey building is of red and blue brick, with some timber framing clad with weatherboarding at first floor level. The plain tiled, hipped roofs have an irregular ridge line and a central valley. The south front has a boarded single door and double wagon doors with a

bressummer, surmounted by first floor double doors with a small gabled hoist above. To the north stand four large red and blue brick roundels with cowls and windvanes.

5.137 A Grade II listed, timber framed building with 15th century origins stands at some distance to the southwest of the proposal site. The building is thought to have evolved from a Hall House, and it has a 16th century range to the rear, together with various modern additions. The timber frame is exposed in places, with some red and blue brick infill. Much of the building has 18th century cladding and the fenestration is irregular. The two-storey building has a hipped, plain tiled roof with a gablet, and a tall brick stack with a projecting breast.

5.138 Cobdown Farm Ditton conservation area abuts the southern end of the western boundary of the proposal site. The designated area is centred on a residual group of agricultural buildings from Cobdown Farm which have retained much original character. The buildings of principal historic interest are the above mentioned Oasthouse and the timber framed Cottages thought to have evolved from a Hall House. A group of 19th century barns and a row of 19th century, former agricultural worker's cottages fronting London Road also make strong contributions to the locally distinctive qualities of the designated area.

5.139 The conservation area appraisal notes that the extensive, open 'green' spaces (sports fields) adjacent to the eastern boundary form an attractive setting to the north and east of the designated area. However, the conservation area's northern and eastern boundaries are delineated by trees and shrubbery, and long views from within the designated area to the sports fields are obstructed by the intervening, leafy barrier.

#### *Impact on Significance*

5.140 The boundaries between the conservation area and Cobdown Park West are delineated by trees and shrubbery along most of their length. In the vicinity of the proposed maintenance yard, a substantial buffer of trees and shrubbery divides the development site from the conservation area, and the proposed site layout indicates that this green buffer will be retained undiminished. Even in leafless conditions, the new maintenance building will be effectively screened, and the new built form will not impinge on views to or from the designated area.

5.141 The proposed maintenance building and the associated service yard result in some loss of undeveloped 'green' space to the east of the conservation area. However, due to complete separation by the intervening buffer of trees and shrubbery, the undeveloped space makes a somewhat limited contribution to the special qualities of the designated area. Although the proposal results in a low level of more formalised development immediately to the east of the conservation area, it will cause little harm to the significance of the designated heritage asset through discrete change on the edge of its setting.

5.142 The listed buildings within the conservation area now sit in domestically scaled curtilages and their historic functional relationships with the surrounding, former farmland have long since been lost. The two listed buildings are set well back from the northern and eastern boundaries of the designated area, and due to distance and the presence of intervening trees and shrubbery, the proposed development will have negligible impact on their significance through change of the periphery of their settings.

*Policy Context*

5.143 The importance of sustaining and enhancing the significance of designated heritage assets is emphasised throughout Section 16 of the NPPF, and paragraphs 212 & 213 note that significance can be harmed or lost through unsympathetic development within their settings.

5.144 Provided the substantial buffer of trees and shrubbery which divides Cobdown Park West from the conservation area is retained undiminished, the proposal will cause no harm to the significance of the adjacent designated heritage assets through change within their settings, and there is no objection in terms of TMBC Historic Environment Conservation Policy.

**Local Representations:**

5.145 Site notices were displayed on the 15<sup>th</sup> August 2025 at eleven locations surrounding the application site. The application was also publicised in the Kent Messenger (KM) on the 21<sup>st</sup> August 2025.

5.146 8 responses objection to the proposal have been received in total. The following (summarised) concerns and objections have been raised:

- Object to closure and diverting of Public Right of Way MR492.
- The Public Right of Way diversion would result in a longer route to and from Station Road.

5.147 8 representations have been received in support of the application, but raise the following (summarised) comments and concerns:

- LCL have already done a lot to improve the pitches.
- LCL have been engaging, transparent and good neighbours.
- Existing clubhouse is an eyesore and support its demolition and replacement.
- Plans look spectacular.
- Perimeter of the grounds needs to be secure.
- Object to closure to the diverted PROW.
- Fencing along west boundary should be sympathetic to open parkland.
- Stricter control is placed on Contractors regarding early/late start/finish and weekend working.
- Request a monthly allowance for car cleaning throughout construction.

5.148 4 letters solely supporting the scheme have also been received raising the following (summarised) comments:

- The club has made lots of effort to communicate their plans and respond to neighbourly feedback.
- The new building proposal is of high quality and a significant improvement on the existing run-down buildings.
- Proposed landscaping alterations will greatly improve the outlook and will improve the north-south public right of way over the existing condition.
- Very supportive of the club's proposals, which will allow LCL to build a long-term platform for sporting success and to develop valuable community outreach programmes in the wider Ditton area and beyond.
- The development will have a positive impact on women and girls in the local area.
- The proposals will improve the north-south public right of way over the existing condition.
- The proposals will be a massive improvement of the grounds.
- The development will provide local employment opportunities.

#### **Other Representations**

##### Aylesford School – Support

5.149 (01/09/25) The facilities would be a huge asset to Aylesford School. We would like to continue and strengthen our community ties with London City Lionesses and increase participation in sport, especially girls football.

##### AFC Leyton – Support

5.150 (27/08/25) The new training ground will be able help and support the girls academy and provide more opportunities for girls and women in the local community to help with development for female only and to start up different but important initiatives such as an all female disability leagues and local school SeND days and be provided in a safe and secure environment.

## **6. Determining Issues:**

### Policy and Other Considerations

6.1 For the purposes of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, the relevant policies of the adopted Development Plan and the Council's Core Strategy are the starting point for the assessment of the planning application and an assessment on the acceptability of this application. In addition, it is important to consider the material considerations of the National Planning Policy Framework (2024), and other guidance contained within the National Planning Policy Guidance.

6.2 The policies and guidance most relevant to this application would be:

- National Planning Policy Framework (NPPF) 2024 (December)
- National Planning Practice Guidance (NPPG)

- Tonbridge and Malling Borough Core Strategy 2007:
  - o Policy CP1: Sustainable Development
  - o Policy CP2: Sustainable Transport
  - o Policy CP6: Separate Identity of Settlements
  - o Policy CP10: Flood Protection
  - o Policy CP11: Urban Areas
  - o Policy CP21: Employment Provision
  - o Policy CP24: Achieving a High Quality Environment
  - o Policy CP25: Mitigation of Development Impacts
  - o Policy CP26: Safeguarding of Community Services and Transport
- Managing Development and the Environment Development Plan Document 2010:
  - o Policy CC1: Mitigation - Sustainable Design
  - o Policy CC2: Mitigation - Waste Minimisation
  - o Policy CC3: Adaptation - Sustainable Drainage
  - o Policy NE2: Habitat Networks
  - o Policy NE3: Impact of Development on Biodiversity
  - o Policy NE4: Trees, Hedgerows and Woodland
  - o Policy SQ1: Landscape and Townscape Protection and Enhancement
  - o Policy SQ2: Locally Listed Buildings
  - o Policy SQ3: Historic Parks and Gardens
  - o Policy SQ4: Air Quality
  - o Policy SQ5: Water Supply and Quality
  - o Policy SQ6: Noise
  - o Policy SQ7: Health and Well-being
  - o Policy SQ8: Road Safety
  - o Policy SQ9: Crime and Disorder
  - o Policy OS1: Protection of Open Spaces
- Development Land Allocation – Development Plan Document 2008
- Supplementary and other documents:
  - o KCC Landscape Assessment of Kent
  - o KCC Parking Standards
  - o KCC's Public Rights of Way Improvement Plan 2018 to 2028 (RoWIP)
  - o Kent Minerals and Waste Local Plan 2013-30
  - o Kent Design SPD
  - o Sport England Playing Fields Policy and Guidance
  - o TMBC Climate Change Strategy 2020 to 2030
  - o TMBC Playing Pitch and Outdoor Sports Facilities Strategy June 2025

#### Emerging Local Plan

- 6.3 The Council's Emerging Local Plan is currently at the Reg 18 stage of the plan making process. On 22/09/22 TMBC launched the Reg 18 consultation which closed on 03/11/22. Since this time, the Council has been progressing towards a second Reg 18 consultation. The TMBC Local Plan timetable is set out below:

| Local Plan Stage                                                                  | Date                                         |
|-----------------------------------------------------------------------------------|----------------------------------------------|
| Approval of a revised Local Development Scheme                                    | Q4 2024/25                                   |
| Regulation 18: Second stage Local Plan consultation                               | Q3 2025/26 (Starting in October 2025)        |
| Regulation 19: Publication of the Pre-Submission Local Plan                       | Q2 2026/27                                   |
| Regulation 20: Consultation on the Pre-Submission Local Plan                      | Q2 2026/27                                   |
| Regulation 22: Submission of the Local Plan to the Secretary of State             | Q3 2026/27 (By or before 12th December 2026) |
| Regulation 24: Independent Examination (including main modifications as relevant) | Q4 2026/2027 (subject to PINS)               |
| Regulation 25: Publication of Inspector's Report (Final)                          | Q2 2027/28 (subject to PINS)                 |
| Adoption of the Local Plan                                                        | Q3 2027/8 (subject to PINS)                  |

- 6.4 It is considered that the emerging Local Plan, at its current stage, cannot be given any weight at this time when assessing planning applications.

#### Background Information

- 6.5 The site is occupied and operated by the London City Lionesses, a professional women's football club who play in the Women's Super League, as their training complex/facility. The club acquired the site in June 2024 from Marpaul Holdings Limited (t/a K Sports), a private company who operated the site privately on a for-profit basis, with pitches available to hire along with a bar and function room. The use of the grounds by any other clubs or users was ceased prior to the sale of the grounds to the London City Lionesses.
- 6.6 As set out within the 'Planning History' section of the report the club, since taking ownership have the site, have undertaken various works to improve the facilities, most notably the standard of the pitches.

#### Principle of Development

##### *National Policy and Guidance*

- 6.7 The NPPF places great weight on sustainable economic development. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Paragraph 85).

- 6.8 Chapter 8 of the NPPF outlines measures for promoting healthy and safe communities ensuring that decisions promote social interaction and enable and support healthy lifestyles i.e. through the provision of sports facilities (Paragraph 96).
- 6.9 Paragraph 98 of the NPPF requires planning decisions to plan positively for the provision of sports venues and open spaces and take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. It also seeks to guard against the unnecessary loss of valued facilities and services where this would reduce the community's ability to meet its day-to-day needs.
- 6.10 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It outlines and illustrates the Government's priorities for well-designed places in the form of ten characteristics.
- 6.11 The Sport England Playing fields policy and guidance outlines five specific exceptions in relation to the loss of, or any proposal that would prejudice the use of a playfield field or pitch.

*Adopted TMBC Policies*

- 6.12 Policy CP11 of the Council's Core Strategy seeks to concentrate development within urban areas. The site is located within the defined settlement and urban area of Ditton and therefore there is no objection to the principle of the development in this location.
- 6.13 One of the aspirations of the Core Strategy is to ensure a sufficient level of good quality employment land in the borough to meet strategic and local requirements. Policy CP1(2) of the Core Strategy sets out that provisions will be made for employment to meet the needs of existing and future residents of the borough. Policy CP21 of the Core Strategy relates employment provisions and comments that new employment provision will be met at Kings Hill and on vacant sites within the main employment areas as well as through the intensification or redevelopment of existing employment sites.
- 6.14 In the above context the site already provides employment opportunities and thus the proposal of intensifying the employment opportunities available at this site would be considered to be in accordance with the aspirations of both Policy CP1 and CP21 of the Core Strategy.

*Open Space and Sporting Provisions*

- 6.15 NPPF Paragraph 104 outlines how resistance must be shown to planning applications which comprise of the building on existing open space, sports and recreational buildings and land, including playing fields and formal play spaces. This is with the exception of:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

- 6.16 Policy OS1 of the Councils Managing Development and the Environment document relates to Open Space and ultimately seeks to maintain an adequate supply in the borough. The Core Strategy seeks to control new development in urban areas, in which the site is designated within, in addition to an emphasis on the protection of open space. In respect of community aspirations. The Core Strategy seeks to ensure the borough has facilities that promote social, health and education support that benefits the local community.
- 6.17 Policy CP26 of the Core Strategy relates to community services and recognises that a range of community services are required for places to be sustainable, including sports facilities. Part 3 of this policy comments that proposals for development that would result in the loss of whole or part of sites or premises currently or last used for the provision of community services, recreation, leisure or cultural facilities will only be supported if (inter alia) '(b) a significant enhancement to the nature and quality of an existing facility will result from the development of part of that facility'.
- 6.18 Sport England's Playing fields policy and guidance document provides guidance on planning applications affecting playing fields which includes all or any part of a playing field, land which has been used as a playing field and remains undeveloped or land allocated for use as a playing field. The guidance explains that Sport England will oppose the granting of planning permission for any development leading to the loss of or prejudicing the use of any of the above unless the proposals meet one or more of five specific exception tests when considering proposals that would affect existing playing fields through the loss of, or prejudice to the use of existing playing fields.
- 6.19 Exception test five is relevant to this proposal which states that 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. It must be noted however that the playing fields policy and guidance is only guidance.
- 6.20 The above policies seek to resist the loss of whole or part of sites that were previously in use for community services, recreation, and leisure and/or open space but note that where significant enhancement to the nature and quality of an existing facility results from the development of that part of the facility then proposals could be supported. NPPF Paragraph 104(c) also outlines support for proposals that result in the loss of community open space for sports use where an alternative sporting use whose benefits clearly outweigh the loss can be demonstrated.

- 6.21 The application site is well established for sports and recreation use and has been in sports use since approximately 1931. It is also designated as an Open Space to be protected. The application site is understood to have always been a privately owned and operated site and has never been a recreation ground openly accessible to the public. Access to the site and facilities has thus always been controlled and managed in some capacity.
- 6.22 The proposed development would retain the site for sporting provisions and not impact upon or result in the loss of the 'Open Space' designation. The proposed development would however result in the upgrading of an artificial pitch, which has previously been used for both football and hockey, to a 3G pitch solely for football use. The upgraded pitch, along with the refurbished pavilion and new car park, would be available for community use on a managed basis. The proposal also includes the creation a recreational area, which provides seating for spectators of the upgraded artificial pitch. The proposed repaired and refurbished Western Lawn Hut would also provide a seating area as part of this recreation area.
- 6.23 The Council's adopted Playing Pitch Strategy acknowledges that there is a national objective to promote football amongst girls and improve the general quality of football pitches across the country. It acknowledges that the applicant acquired the site for their sole use as a professional training ground facility with the cessation of leases and informal booking arrangements carried out by the previous owners and that former uses were on a temporary and informal basis with both a hockey and croquet club's leases having expired in 2024.
- 6.24 The Playing Pitch Strategy identifies a deficiency in hockey pitch provisions in the borough but does not identify any specific need for croquet. The Strategy however also notes that there is a need for additional sports lit 3G pitches to meet the demand from grass roots football.
- 6.25 Whilst the proposed development would not result in the loss of a designated open space it would result in there no longer being the potential for hockey and croquet to take place at the site. Both sports were once previously played at the site but ceased under the previous ownership. It is understood that such uses were only ever on short term leases/rolling contracts and currently there are no planning controls to ensure that certain sports are played at the site or that the site is available for public use. It is also noted that the site is privately owned.
- 6.26 The Playing Pitch Strategy comments that the pitch proposed to be upgraded as part of this application suffered from flooding issues creating issues with usage of the hockey pitch and that the pitch was only used 40% of the time by hockey (16 hours) with the remaining 60% of the time (24 hours) in use by football.
- 6.27 The hockey club who previously made use of the artificial pitch at the site (K-Sports Hockey Club) are understood to still be looking for alternative pitch provisions but have however explored the possibility of using three pitches outside the borough: Invicta Grammar School for Girls in Maidstone; Thomas Aveling School in Rochester

and Sutton Valence School in Maidstone. From review of the club's website, it would appear that the club continue to operate multiple men's and women's teams along with a junior side and presently play the majority of their home fixtures at the Thomas Aveling School in Rochester.

- 6.28 The Playing Pitch Strategy also identifies and comments that K-Sports Hockey Club are keen to explore options for establishing a new permanent venue in the north of the borough, with Kings Hill Sports Park and Aylesford Bulls Rugby Club possible locations. Currently no planning permission is in place for the creation of a hockey pitch at either of these venues.
- 6.29 The croquet club (Medway Croquet Club) are also understood to have used the site on a seasonal basis and play predominantly took place over the summer period only on a relatively small area of grass at the western end of the site. Croquet was not assessed in the Council's playing pitch strategy. There is therefore no evidence base identifying a croquet need or shortfall in the borough. There is therefore no objection to the proposed application on this basis.
- 6.30 The previous owner of the site secured planning permission in 2016 (reference: 16/00955/FL) for upgrades to the site facilities and pitches. Attached to that planning permission was a requirement for a community use agreement to be submitted in consultation with Sport England (condition 14). This condition was never discharged. There was no recourse from the Council nor Sport England and given the passage of time that has passed (almost 10 years) there is therefore no planning mechanism that is likely to secure or insist upon any of the former uses at this site being retained or re-provided including the hockey and croquet uses.
- 6.31 The proposals include the provision of a new 3G football pitch in place of the existing, poorly maintained sand dressed artificial pitch which will be made available for use by the Academy and the community on a managed basis. This new 3G football pitch would not lead to the loss of or prejudice the use of all or any part of the existing hockey pitch. The existing croquet lawns are essentially areas of grass (not marked out) that are technically retained as part of the recreational area so there is no overall loss of the lawns.
- 6.32 Whilst it is acknowledged that the use of the artificial/hockey pitch will change, the proposals either do not result in a loss of or prejudice the use of pitches, or, to the extent that they are considered to do so, they meet the tests in exception 5 (Sport England's Playing fields policy and guidance document), which allows for provision of indoor or outdoor facilities 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.
- 6.33 The proposed upgrades to the artificial pitch to a football 3G pitch would provide the mechanism to enable the growth of the Academy which has a clear direct benefit to

the local community (especially as it is only players from Kent that will be in the Academy).

- 6.34 Moreover, the proposals meet an identified need in the borough which is acknowledged by Sport England and within the Council's adopted Playing Pitch Strategy. The proposals also include a community benefits offer and suite of planning benefits, which is significantly greater than those offered by the current site or that could likely be offered by an alternative owner of this site. The benefits arising from the London City Lionesses residence and investment in the borough represents a significant opportunity which would not be on offer should the site be put back on the market for alternative use(s).
- 6.35 The community benefits proposed are to be secured by a legal obligation to ensure the benefits can be legally secured.
- 6.36 It is not considered that there is a planning justification for securing a replacement hockey pitch (or croquet lawns) via on or off-site equivalent provision. There is no deemed loss of pitches or use at this site and to the extent that it may be considered to be, this is allowed for by Sport England exception 5 test in their playing pitch guidance which acknowledges where the provision of sporting facilities that are of sufficient benefit to the development of sport can outweigh any detriment caused by the loss, or prejudice to the use of the playing field. The exception 5 test also reflects the approach taken when considering the planning benefits and merit of a planning application (the 'tilted balance') as set out in paragraph 11(d) of the NPPF. Paragraph 11(d) states that for the purposes of decision-taking where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless (i) policies that protect areas or assets of particular importance provide a strong reason for refusing the development proposed or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Therefore, in planning assessment terms, if the conversion of the hockey pitch to a football pitch was considered to be a 'loss' the community benefits and planning benefits proposed by the proposals as a whole are considered to far outweigh any loss of a relatively poor quality and flood affected pitch which was used less than half the time for hockey. The croquet lawns were only used seasonally. It is therefore not considered necessary or justifiable in planning terms to secure replacement provision and policy does not require that.
- 6.37 Sport England request a Grampian planning condition to prevent development on the hockey pitch and croquet lawns until alternative provision has been made elsewhere. However, on the basis that the proposals do not result in an overall loss of pitches or prejudice sports use on site policies in relation to 'loss' of pitches or use on this site are not engaged. Alternatively, if it were considered that there is any loss of pitches or use is prejudiced, the proposals fall within exception 5 of Sport England's policy, which cannot be read so as to require replacement facilities to make the development acceptable. It is noted that Paragraph 61 of Sport England's policy

does refer to the use of Grampian conditions, but this is in the context where replacement provision is required and notwithstanding Sport England's consultation response, it can be concluded that replacement provision is not a policy requirement in respect of this application.

- 6.38 The NPPF states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations (Paragraph 56). The proposals are not considered to be unacceptable development that needs to be made acceptable through use of planning conditions on the basis that they align with planning policy requirements. The suggested Grampian planning condition does not therefore meet the relevant tests of the NPPF, which requires that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 57) which is not the case here.
- 6.39 In the absence of a Grampian condition Officers have treated the application as though Sport England have objected to the proposed development. Sport England have confirmed that as the land is not owned by the Local Authority and it is not educational that the application is non-referrable. Therefore, should the LPA wish to grant permission for the proposed development the decision would not automatically be referred to the Secretary of State by Sport England.
- 6.40 The proposals do not result in the loss of a recreation and leisure and/or open space on this site and community use is proposed for women and girls to be retained on-site. The proposals would result in significantly improved sports pitches and facilities inclusive of a high quality 3G football pitch that would be available for use by the community on a managed basis. The proposed development would not result in the loss of a designated open space, future proof the site as a sporting facility and thus the proposed development would be considered to comply with the requirements of Policy OS1 of the Councils Managing Development and the Environment document.
- 6.41 The proposed development is considered to fully align with planning policy objectives by delivering a new world class training facility for women and girls, a significantly expanded Tier 1 Professional Game Academy (the only one in Kent) which will protect and retain the existing sports and recreation use of this site as well as retained community use and preservation of the openness of this site in line with local policy requirements.
- 6.42 The harm caused as a result of the development are considered to be significantly outweighed by the benefits proposed to the site and the significant upgrade to the existing facilities alongside the suite of other planning benefits in line with paragraph 104(c) of the NPPF and part 3 of Policy CP26 of the Core Strategy and Sport England's exception 5.

6.43 The following sections outline the extensive benefits that would be delivered by the development. However, the proposed development would deliver a world leading state of art training ground facility for women and girls. The proposed professional nature of the site would result in a carefully managed site to reflect its professional standards; generating a less intense use on the basis that not all pitches will be used at one time; would enable reduced hours of operation for the existing sports lighting; would eliminate anti-social behaviour (a previous issue at the site); and result in more carefully managed car parking. The proposal ensures the site remains as open space and in sports and recreation use.

#### *Community Benefits*

6.44 In summary, the community benefits would include:

- Conversion of existing synthetic sand-dressed pitch to a 3G football pitch for use by Academy and the community on a managed
- Potential for the 3G pitch on-site to be used as a central hub for Kent Girls and Ladies Football Leagues and other Kent FA recreational women's football league.
- Opportunity to host a Kent disability mixed league.
- Local school SEND days.
- Opportunities for the community to use an elite football facility.
- Creation of an adjoining recreational area to include benches and landscaped spaces for spectators of the community pitch.
- Refurbishment of the existing Cobdown Park Pavilion to provide changing and kitchen facilities as well as meeting spaces.
- Provision of dedicated community car parking to the south of the pitch along with four disabled spaces adjacent to the Cobdown Park Pavilion.
- On-site initiatives such as clinics and coaching sessions for local female coaches working in the female game as well as mentoring support for female coaches for the benefit of local football clubs.
- Comprehensive programme of off-site community benefits and initiatives will be developed. A Community and Fan Engagement Manager has been appointed to facilitate this programme, and this outreach has already begun working with 35 local schools and building links with local football clubs including hosting 14 events so far this summer reaching out to approximately 9,000 girls and boys.

6.45 A community benefits plan is proposed to be secured via a legal agreement.

#### *Social Benefits*

6.46 In summary other social benefits would include:

- Increased female participation in sport from grassroots level to elite level through the creation of a Centre of Excellence for the development of Women and Girls' football.

- Provision of state-of-the-art facilities that very few clubs in the UK have access to enable the players to have the opportunity to reach their highest potential and help to progress the women and girl's game.
- Facilities that will promote wellness amongst the players and staff including the provision of childcare facilities to ensure parenthood doesn't serve as a barrier to playing sport at the highest levels.
- Supporting the growth of the elite women's team will help to raise the profile of women's football at a local, national and international level.
- Proposals that will enable the Academy to significantly grow extending its outreach to the local community and creating a 'safe space' and high quality sport environment for young girls.
- Enabling increased levels of participation in sport will help to deliver significant health and well-being benefits including mental health benefits and will help to challenge gender stereotypes and discrimination against women.
- The creation of football related career opportunities which can benefit local people trained in those areas including roles in coaching, training, therapists and nutritional advisers.
- On-site initiatives such as clinics and coaching sessions offered to local female coaches, referees and local women and girls for the benefit of local football clubs.

#### *Employment Opportunities*

6.47 The proposed development is expected to generate an average of 30 FTE on site construction roles over the duration of construction (around 15 months). Off-site construction roles are expected to be in the region of 285 FTE jobs over the same construction period including approximately 155 offsite roles.

6.48 The provision of a range of new jobs across the skills profile for residents in the local area and across the borough more widely would make a significant contribution towards building a strong and competitive economy.

6.49 Employment and training obligations in relation to local employment and training and local supply chain commitments have been secured via a legal agreement.

#### *Economic Benefits*

6.50 In summary, the economic benefits would include:

- Estimated an average of 30 FTE on-site construction roles over the duration of construction (around 15 months).
- Off-site construction roles are expected to be in the region of 285 FTE jobs over the same construction period including approximately 155 offsite roles.
- Approximately 50 FTE jobs on-site (once operational). A net increase of 35 across a range of different sectors and skill levels.
- The net-additional jobs on-site once the scheme is complete and operational would support wages in the region of £1million per year, which would

contribute to additional spending within Tonbridge and Malling Borough, thus supporting more employment and economic activity at other businesses.

- Once operational, the jobs could generate up to £110,000 per year in local spending a proportion of which could be captured by businesses in the surrounding area.
- Both the construction and operational phase of the Proposed Development have the potential to generate Gross Value Added to the regional and local economy, respectively.
- The on-site net additional construction employment would support the equivalent of c.£18.8 million in GVA within the regional construction economy (based on average GVA per head in the construction industry). The increase in end-use employment on-site could make an economic contribution in terms of Gross Value Added (GVA) of approximately £810,000 per year.

6.51 The provision of a range of new jobs across the skills profile for residents in the local area and across the borough more widely would make a significant contribution towards building a strong and competitive economy.

#### *Sustainability*

6.52 Clearly, an important element of the principle of development is whether the proposal would constitute sustainable development having regard to the local plan policies and the NPPF. This is outlined within Paragraphs 7 to 11 of the NPPF which goes on to explain that there are three dimensions to sustainable development:

*‘an **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*a **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*an **environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.’*

6.53 It is therefore clear that sustainability is a multi-faceted and broad-based concept. It is often necessary to weigh certain attributes against each other in order to arrive at a balanced position with regard to the sustainability of the scheme overall.

#### *Economic objective*

- 6.54 A number of important economic considerations have already been discussed above such as the contribution of the development towards delivering a significant level of employment opportunities both once built out and operational and during the construction phase.
- 6.55 The development of the site offering such a high level of future employment opportunities would also have the benefit of improving further the social aspect of sustainable development by providing greater levels and choices of employment to local people. The development of the site offering this level of future employment opportunities would also have the benefit of reducing commuting for local employees providing a more sustainable workplace which would be accessible by a shuttle bus service as well as by major arterial highways routes.
- 6.56 As such, the economic impacts and benefits of the scheme would clearly provide significant economic stimulus to the borough, local area and wider region. It is considered overall that the proposal would be sustainable from an economic perspective.

*Social objective*

- 6.57 A number of important social consideration have been set out above such as the provision state of the art facilities and the impact of such a development would have more widely upon women's and girls' football along with grassroots football.
- 6.58 In addition, the creation of a hight quality community pitch along with supporting facilities such as the refurbished pavilion, designated parking provisions and an adjacent recreational/seating area would enhance the offerings available in the locality. These proposals would also be considered to promote social interaction.
- 6.59 The proposed retained, but diverted Public Right of Way would be considered overall to enhance connectivity and notably improve the standard of the right of way running across the site.
- 6.60 The proposed development is considered to support strong, vibrant and healthy communities and support communities' health, social and cultural well-being. Taking the above points into consideration, the proposal is considered to offer some good attributes and would be sustainable from a social perspective.

*Environmental objective*

- 6.61 In terms of the environmental objectives, the site is within a defined urban area, however a Public Right of Way runs across the site. The site is designated open space and whilst it does contain some built form, including two artificial pitches, the application site generally has boundaries of trees and hedgerows.
- 6.62 Much of the boundary hedgerows and trees form a significant element to the character of the site and its character. Views into the site from adjacent public

vantage points are considered to vary where at some points the site is considered to be well screened by existing planning whereas in others the site is highly visible.

- 6.63 Whilst the proposals will likely appear visible from public vantage points, they are not considered to significantly detract from the locality and in parts can be seen in context with the existing site and built form. It is also noted that the proposal includes additional planting and landscape to further soften the impact of the proposal. The proposed replacement building is also considered to be a high quality, contemporary design, and not of an excessive scale. It is visually attractive and replaces and building of a little to no architectural merit.
- 6.64 The vast majority of trees and planting at the site is to be retained. Whilst there would be some tree loss, this has been justified within the submission and is proposed to be mitigated by the re-planting of trees and landscaping within the site (the specific tree impact is discussed in more detail later in this report).
- 6.65 Whilst there would clearly be some limited and localised landscape harm by virtue of the introduction of the proposed development, this harm would be highly limited and reduced by virtue of the design qualities and landscape mitigation secured within this scheme. Furthermore, the site is located within a defined urban area and the development and future management offers the opportunities to safeguard and appropriately manage the wider site, landscaping and trees to secure protection of the features and some long-term benefits. With this in mind, it is considered that the proposal would be sustainable from an environmental perspective.

#### *Summary*

- 6.66 Overall, the proposal is considered to constitute sustainable development having assessed the development against the three objectives as highlighted within the NPPF and set out above. The proposal is considered to be in accordance with national, local and emerging policy and is considered to provide significant economic benefits to the borough. It is therefore considered that the principle of the development is acceptable.

#### Visual Impact

- 6.67 Chapter 12 of the NPPF emphasises the importance of achieving good design through the development process. Paragraph 131 sets out that good design is a key aspect of sustainable development and Paragraph 139 states that permission should be refused for development of poor design especially where it fails to reflect local design policies and government guidance on design. It goes on to comment that conversely, significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.68 The National Design Guide sets out ten characteristics which define well-designed places and together create its physical character, help to nurture, and sustain a

sense of community and work to positively address environmental issues affecting climate. Which include understanding and relating well to the Site, its local and wider context (C1), responding to existing local character and identity (I1), producing well-designed, high quality and attractive places and buildings (I2), creating character and identity (I3), using appropriate building types and forms, (B2), improving and enhancing water management (N2), supporting rich and varied biodiversity (N3) and creating a destination (B3).

- 6.69 Policy CP24 (Achieving a High Quality Environment) of the Core Strategy seeks to ensure that all development in the borough is well designed and of a high quality in terms of detailing and use of appropriate materials, and is designed to be of a scale, density, layout, siting, character and appearance which respects the site and its surroundings.
- 6.70 Policy SQ1 (Landscape and Townscape Protection and Enhancement) of the Councils Managing Development and the Environment requires that all new development should protect, conserve and, where possible, enhance the character and local distinctiveness of the area.
- 6.71 The proposed development seeks to demolish and replace the existing club house building located towards the main entrance to the site. The existing building is of little to no architectural merit and whilst it is not considered to appear out of character to the area it is not considered to positively contribute to the visual amenity, appearance or setting of the locality. There is therefore no objection to the demolition of this existing structure. There is also no objection to the removal of several ancillary and temporary structures at the site. The removal of these structures is considered visually enhance the site.
- 6.72 The proposed replacement Clubhouse and refurbished Academy building to create the 'Performance Campus Building' is of a high standard, which respects the site's location and characteristics and minimises the impact upon the openness of the open space. The scale and massing of the building is not considered to be excessive or appear at odds with the immediate area. Whilst the proposed building would be visible from Station Road and the diverted Public Way it is considered appear visually attractive and would be a landmark building for the borough and Ditton.
- 6.73 The proposed materials and external finishes, whilst modern and contemporary in appearance, would not be considered to detract from the character of the area of street scene. To ensure a high-quality finish material details have been conditioned.
- 6.74 Whilst the proposed development and building would be larger than that which it replaces it is considered to visually enhance the site and its setting, particularly in comparison to the existing building. It would provide a modern building, of a high-quality standard, which would respect the site's setting and locality and be visually attractive. The proposed 'Performance Campus Building' is therefore considered acceptable regarding design and visual impact.

- 6.75 The proposed refurbishments of the Cobdown Park Pavillion and Western Lawn Hut are considered to appear attractive and would not be considered to have a detrimental visual impact.
- 6.76 The proposed Security Gate House at the entrance of the site is considered to be of a modest scale and not appear highly prominent. It would be seen in context with the proposed Performance Campus Building and would not be considered to be harmful to the character of the street scene or area. The proposed entrance gates would also not be considered to appear visually intrusive.
- 6.77 The proposed relaying of an existing artificial pitch and upgrades to academy pitches would not be highly visible or significantly change the appearance of the site.
- 6.78 The proposal includes the creation of a new parking area to the south of the community pitch. This part of the site would be highly prominent from the diverted Public Right of Way. The proposal would result in the loss of an existing grass surfaced area and likely require some cut and fill into an existing bank. However, the proposal of a parking area in this part of the site would not be considered to appear out of character with the site and general locality and would be softened, to some extent, by planting. The benefits of the creation of this parking area is considered to outweigh the limited localised visual harm.
- 6.79 The proposal includes the provision of a new Grounds Maintenance Building and service area in the southwest of the site. This part of the site is presently a hard surfaced storage yard. The proposed building is a simple, single storey, pitched roof structure finished in horizontal timber cladding. Whilst the building would sit relatively close to the London Road (A20) and the proposed diverted Public Right of Way, a row of significant and well-established trees are located along the south boundary of the site, which would largely screen the structure and limit its visibility from public vantage points to the south of the site. In any case the proposed building is not considered to be of an excessive scale or of a design that would appear highly prominent. The proposed building is not considered to have a harmful visual impact or detract from the site's setting and location.
- 6.80 The proposed development would result in the loss of some trees located predominantly within the site rather than along the boundaries. To off-set this loss 90 native trees are proposed to be planted across the site along with native hedgerows. In addition, species-rich grassland and meadow planting is proposed to be integrated around pitches and car park verges. The proposed landscaping is considered to visually soften the impact of the development.
- 6.81 The proposed boundary treatments are considered to be sensitive the site and its locality, including the proposed 1.2m high post and rail fencing along the western boundary of the site.

- 6.82 By virtue of the high design qualities and landscape mitigation secured within this scheme the proposed development is not considered to have an unacceptable visual impact. Furthermore, the development and future management offers the opportunities to safeguard and appropriately manage the wider site, landscaping and trees to secure protection of the features and some long-term benefits. Details of landscaping and tree protection measures can all be adequately secured via conditions.

#### Lighting

- 6.83 Policy DC5 of the Council's Managing Development and the Environment Development Plan states that proposals for new leisure facilities will be permitted subject to there being no unacceptable adverse impacts arising from lighting.
- 6.84 A lighting impact assessment has been prepared and submitted in support of the application. The assessment has been prepared by a suitable professional and from discussions with the Council's Environmental Protection Team it is considered that the indicative level and type of lighting proposed to serve the development is appropriate and would not be excessive. To ensure that the proposed lighting is appropriate to serve the development and has minimal visual impact that a condition is attached to ensure appropriate lighting is delivered.
- 6.85 The reduced hours of operation of the sports/flood-lit pitch lighting along with the proposed upgrades to utilise more current lighting technology would further soften the impact of the development and is considered a benefit of the proposal.

#### Highways and Parking

- 6.86 Paragraph 116 of the NPPF sets out that *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'*
- 6.87 Paragraph 118 of the NPPF requires that developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- 6.88 Policy CP2 (Sustainable Transport) of the Council's Core Strategy seeks to ensure that new developments are well located relative to public transport links, provide a choice of transport modes, are compatible with the character and capacity of the highway network, provide for any necessary enhancements to the safety of the highway network and ensure accessibility for all.
- 6.89 Policy SQ8 (Road Safety) of the Council's Managing Development and the Environment Development Plan comments that development proposals will only be

permitted where they would not significantly harm highway safety and where they comply with parking standards.

#### Access

- 6.90 This application proposes to retain the existing access from Station Road with the installation of a new cantilever sliding security gate. Outside of the nominal operating hours of the site an access control system will ensure that only authorised visitors can access the site. The gate will be set back a distance of 9.2m from the edge of the carriageway (7.5m from the back of the footway) to allow up to a 4.6 tonne light van to wait off the carriageway. Larger vehicles including refuse vehicles and coaches will schedule their arrival with the security staff to enable the gate to be open. A secondary vehicle control boom gate on the main access road before the service yard entrance will form part of a wider secure access arrangement ('airlock system') to manage controlled ingress and egress to the site.
- 6.91 Access within the site will continue via the existing internal private access road (Cobdown Park Road). Pedestrian access to the site is proposed via a footway and pedestrian access gate at the existing access on Station Road.
- 6.92 Under the provisions of Section 257 of the Town and Country Planning Act (1990) which enables the diversion of a public footpath where it is necessary to enable a development to take place in accordance with planning permission, an application has been submitted to KCC (on behalf of TMBC) in parallel to this application to seek the diversion of the existing public footpath MR492 where it passes through the site and conflicts with the proposed development. The diversion is sought not only to facilitate the proposed configuration and layout of the Performance Campus but crucially to ensure the safety and privacy of the First Team and Academy players which is necessary to enable the development to be carried out. Ensuring the safety and wellbeing of the players.
- 6.93 KCC Highways consider the existing access arrangements to be of a high standard, as characterised by its direct access to existing footways on the wider network, wide carriageway widths, extensive visibility splays and good collision record (1 slight collision recorded during the assessed period). Minor amendments are proposed to the site's internal access arrangements via the introduction of security gates and a security lodge that will be manned 24/7. Importantly, the gate is to be situated over 9 meters from the edge of the carriageway, thereby allowing the majority of vehicles to wait off the highway and preventing the obstruction of it.
- 6.94 Whilst the secondary access on the site's southern boundary is to be retained there would be no intensification in its use because of the proposed development. There is therefore no increased risk of conflict on this strategic route (A20).
- 6.95 Multiple turning areas are proposed to be provided across the site, in addition to dedicated coach parking in the southern section. In addition, the swept path analysis provided in support of the application confirms that an articulated vehicle up to 16.5

meters in length can enter the site, turn and egress onto the highway in a forward motion. On this basis the site's internal layout is acceptable.

- 6.96 From discussion with KCC Highways and National Highways it is considered that the application has adequately demonstrated that safe and suitable access to the site can be achieved by all relevant transport modes and that the proposed development would not have a detrimental impact upon highway safety.
- 6.97 KCC Highways have recommended a condition restricting the use of the development by the community and for private hire to be restricted to Sundays only. However, it is noted that the site is no longer to be operated on a pitch for hire basis and that the submitted transport assessment demonstrates that the movements to and from the site (including the proposed community use) in comparison to the site's previous way of operating would not result in a significant increase in movements or have a detrimental impact upon highway safety. Restricting the community use of the site solely to Sundays would also significantly limit the community benefits being proposed. It is considered that this matter can be adequately covered via car parking management condition along with more general site management/operations/hours of use conditions.

#### *Parking*

- 6.98 The proposed parking provisions are set out in Table 4 of the 'Description of Proposal' section of the report. Parking and cycle parking is proposed to be provided in accordance with the maximum standards set out within KCC guidance, within the Kent and Medway Structure Plan (Supplementary Planning Guidance 3 and 4) and with other relevant guidance. Electric Vehicle charging facilities are also proposed to be provided in accordance with the relevant building regulation requirements.
- 6.99 The proposed level of parking to serve the proposed development is policy compliant and would ensure that there are adequate on-site parking provisions to serve the development. The proposed parking provisions are not considered to result in any detrimental impacts upon the highway network or highway safety. The proposed formal parking arrangements are considered appropriate to serve the development.

#### *Vehicle Movements*

- 6.100 The development is anticipated to generate 15 trips (combined arrivals and departures) in the AM peak (08:00-09:00) and 83 trips in the PM peak (17:00-18:00). The development is anticipated to lead to a net decrease in trips during the AM peak and extremely limited increase in trips during the PM peak, it is not considered that the impact on the wider network in capacity or congestion terms could be reasonably described as 'severe.'
- 6.101 Additionally, KCC Highways are aware that nearby approved developments are in the process of upgrading local junctions, including the Station Road/New Road/A20 junction, with the latest phase of works having been completed during the recent

summer holiday period. These upgrades will assist in absorbing the modest increase in trips expected during the PM peak period.

6.102 The proposed development is not considered to generate such a level of movements to and from the site, which would be detrimental to highway safety or the surrounding road network.

#### Framework Travel Plan

6.103 The application is supported by an outline travel plan in line with Paragraph 118 of the NPPF. The travel plan seeks to proposed to the following initiatives to minimise the need to travel by private car and promote sustainable travel modes. The initiatives proposed could include the below.

#### *Walking and Cycling*

6.104 To encourage walking and cycling, the following initiatives are proposed to be implemented:

- Promote the health benefits of walking and cycling via notice boards in communal areas; for example “walking one mile in 15 minutes burns a similar number of calories as running one mile in 9 minutes” and “cycling 4 to 5 miles only takes around 20 minutes”;
- Provide a Staff Welcome Pack to new employees, detailing local walking and cycling routes;
- The government cycle to work scheme will be promoted to staff which allows a tax exemption for bicycles and accessories up to £1000.
- Ensure the upkeep of convenient and secure cycle parking and changing facilities;
- Provide information to staff and players regarding local pedestrian routes and cycle access;
- Ensure that pedestrian routes within the site are easily accessible and well-lit to promote their use and the safety of the staff, players and visitors; and
- Consider taking part in the ‘Bike2Work’ scheme, offering staff and players the opportunity to purchase a bicycle at a reduced price.

6.105 Cycle parking is proposed to be provided in the form of:

- short-medium term cycle parking for visitors and will consist of Sheffield stands located within a shelter open on one side to allow access;
- medium-long term cycle parking for players and staff. This will consist of a secure and covered external cycle shelter or an internal storage area, both with controlled key/card access; and
- Cycle parking for the mobility impaired will be provided in line with the Kent Parking Standards.

6.106 Separate shower, changing, and locker facilities are proposed to be provided within the site for staff and players.

### *Car Sharing*

6.107 The following measures are proposed to be introduced to encourage lift sharing:

- The promotion of <https://liftshare.com> which links two or more people (not necessarily from the same site) travelling from the same place and has a high rate of matches. Information packs can be requested online;
- The provision of practical advice on car sharing, including publicising the benefits via noticeboards, leaflets and Staff Welcome Packs for all new staff and players;
- Lift sharing will be encouraged particularly amongst players and staff who may attend the same schools or be travelling from the same area. Given the focus on 'teams' inherent with a football training Academy, it is likely that lift sharing will occur naturally between teammates and friends. This will be further encouraged;
- The creation of an in-house database for staff and players, to co-ordinate lift sharing opportunities; and
- Engagement with a local taxi firm to provide an emergency lift home service for staff and players who have car shared.

### *Public Transport*

6.108 Measures to promote the encouragement of public transport use to staff, players and visitors to the site is proposed to include the following:

- Information with regard to local public transport services will be presented to all users of the site. Information will be displayed on notice boards located in communal areas, with easy-to-read timetables and plans indicating where services can be accessed;
- Liaise with public transport operators to offer 'taster' tickets to all new staff and players;
- Staff & player Welcome Packs will be produced, detailing local public transport services; and
- All users will be made aware of online information and journey planners.
- The implementation of incentives to encourage public transport use such as subsidised Oyster cards and Rail Cards that offer 1/3 off travel will be advertised, as well as additional benefits such as a free trial to TasteCard that offers discounts on cinemas and restaurants, amongst other offers.
- It is proposed that shuttle buses and coaches will be used for team travel to and from the site.

### *Provision for Electric Vehicles*

6.109 EV charging points are proposed to be provided on-site in accordance with Part S of the Building Regulations.

### *Coach Travel*

6.110 A coach parking space is proposed to be available for visiting teams and coach travel is proposed to be maximised, particularly during busy periods such as the weekend when multiple games may be taking place at once.

*Eco Driver Training and Driver Aids*

6.111 The plan includes the promotion of economical driving in circumstances where the use of a car to access the site is unavoidable. Driving more economically involves (amongst other things):

- Anticipating traffic movements further down the road and braking and accelerating smoothly in response to any change in traffic conditions.
- Changing to a higher gear as soon as possible and maintaining low RPM.
- Checking tyre pressures regularly to ensure the safest and most fuel-efficient pressures are being maintained; and
- Turning off your engine when static for more than 60 seconds.

6.112 The use of aftermarket driver aids is also to be promoted. Driver aids encourage fuel efficient driving habits by rewarding those who drive in an economical way. Rewards include discounts from certain car insurance and breakdown cover providers, as well as electronic goods and track day experiences.

*Event Management*

6.113 A car park management plan can be implemented to maximise the shared use of on-site parking, thereby fully meeting the parking needs of the development within the available permanent parking provision. This includes a regular review of parking demand and a review of the surrounding area to ensure that off-site parking does not occur.

*Flexible Working*

6.114 Where possible and viable, employers should seek to encourage home working as part of a flexible working environment, to help reduce the need to travel for staff. Flexible working hours and arrangements are proposed to be permitted within reason and as appropriate in order to encourage staff to travel together.

*Visitor Travel*

6.115 Members of staff, players, parents, visitors, and away teams will be made aware of the existence of the Travel Plan and of the transport alternatives available. They will be made aware of the costs associated with different forms of travel, and the travel plan co-ordinator (TPC) will provide regular information on the financial and time costs and benefits associated with different travel options. Liaison between the football club, TPC, local authorities, and the local public transport operators will be promoted.

*Summary*

6.116 The proposed initiatives would be considered to minimise the need to travel by private car and would promote sustainable travel modes as required by the provisions of the NPPF. The submission of a Travel Plan pursuant to the approved Framework Travel Plan has been secured via a legal agreement.

Public Rights of Way

- 6.117 Paragraph 105 of the NPPF sets out that planning decisions should *‘protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.’*
- 6.118 Paragraph 7.7.2 of the Council’s Managing Development and the Environment Development Plan comments that in considering development proposals the Council will seek to retain the existing rights of way network and encourage new developments to create layouts that promote opportunities for enhanced access to the network.
- 6.119 KCC’s Public Rights of Way Improvement Plan 2018 to 2028 (RoWIP) recognises that development in the county has placed significant pressure on the PRoW and Access Service, but that it has also provided significant opportunities to secure improvements to the network, particularly connectivity, asset renewal and provision for higher rights users.
- 6.120 The proposed development includes the diversion of Public Right of Way MR492 so that the right of way enters the site from London Road (approximately 230m to the west of the existing entrance point along Station Road) and runs parallel with the existing internal driveway within the site in a northern direction before continuing at the top of the road turning right along Ditton Stream until it meets public footpath MR491. The diversion is to ensure the safety and privacy of the first team and academy players which is necessary to enable the development to be carried out. This diversion is also to be the subject of an application to KCC (under the provisions of Section 257 of the Town and Country Planning Act (1990)).
- 6.121 The applicant has engaged extensively and positively with KCC with regards to the proposed right of way diversions as well as consulting more widely with the public through two public exhibitions (held in May and June 2025). Because of the physical incompatibility the diversion is necessary to facilitate the delivery of the proposed Performance Campus at the site.
- 6.122 Public Footpath MR492 currently crosses areas identified for development and would be directly obstructed by the proposed layout of training pitches, associated infrastructure, including a pitch plant enclosure, and boundary treatments. In addition to this physical conflict, the current alignment of the right of way raises significant safeguarding and security concerns due to its location within sensitive training areas used by girls. There is also a need for the applicant to protect the confidentiality of the First Team’s training plans and strategies, which are not intended to be visible to the media or club’s competitors.
- 6.123 The existing footpath running across the site is poorly surfaced in parts, unlit, relatively narrow in parts and generally considered unsuitable for wheelchair users or pushchairs. The existing right of way is not considered to appear particularly user

friendly or provide an attractive and inviting routeway. The proposed new/diverted right of way avoids areas of built development, follows a clearer and more legible north-south route through the site, and offers an improved surface and experience for public users. The design integrates with the overall landscape and access strategy for the site, providing a pleasant route alongside the stream to the northwest of the site, whilst providing greater passive surveillance, which is expected to reduce the risk of antisocial behaviour. Importantly, the diversion maintains connectivity with the wider Public Rights of Way network and enhances accessibility for all users.

- 6.124 From discussions with KCC Public Rights of Way it is considered that the proposed diversion is acceptable in planning terms, subject to conditions. However, in order to divert the right of way a KCC Section 257 application will need to be separately approved. This is a matter, which falls outside of the consideration of this planning application. A number of the points raised within the comments from the KCC Public Rights of Way team will be required to be addressed under the S257 application.
- 6.125 It is considered that the proposed diverted right of way would provide a significantly more attractive and user friendly routeway across the site and towards the industrial estate known as Panattoni Park (located to the north on the opposite side of the M20). The proposed route will offer improved surface and edge treatments, creating a less enclosed and much more attractive and user-friendly walking route. The new design will promote improved safety through a less enclosed, well maintained and partially lit route. Clear wayfinding is proposed to be provided to demarcate the right of way footpath from internal access routes, alongside planting and passive safety measures to assist in safe movement of public across the site.
- 6.126 It is acknowledged that the proposed re-location of the entrance point to the site and diverted right of way from Station Road to the west and along London Road would increase the distance to some users. However, the distance is not considered to be excessive, and it is noted that Public Right of Way MR491, located to the northeast of the site would remain accessible from Station Road (as existing) and the northeast corner of the application site. This right of way connects to MR492 and leads across the M20 and towards Panattoni Park. The proposed diverted right of way would be considered to overall enhance pedestrian and cycle connectivity.
- 6.127 It is considered that the proposal provides a considered balance between enhanced public access, ecological preservation, and the safeguarding of professional sporting activity and particular the girls academy. The proposed diverted routeway is considered to provide public benefits by enhancing pedestrian connectivity, safety and wayfinding.
- 6.128 Based upon the above and from discussions with KCC Public Rights of Way team it is considered that the proposed development would not have an unacceptable impact upon the Public Rights of Way network and that the proposed development is acceptable in this regard.

Heritage and Archaeological

- 6.129 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and case law makes it clear that, amongst other things, when a development will harm a heritage asset of its setting, the decision-maker must give that harm considerable importance and weight; with reference to S.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it clear that the decision-maker is only asked to preserve the special character and appearance of such areas and not enhance them.
- 6.130 Paragraph 207 of the NPPF sets out that in determining applications should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The paragraph goes on to comments that *‘Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.’*
- 6.131 Paragraph 212 of the NPPF states that *‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’#*
- 6.132 Policy SQ2 of the Council’s adopted Managing Development and the Environment Development Plan relates to ‘Locally Listed Buildings’ and ultimately seeks to retain, wherever possible, and protect heritage assets from development that would harm their setting or local historic or architectural interest.
- 6.133 Aim 3 of the Council’s adopted Core Strategy seeks to ensure that that new development result in a high-quality environment by protecting and enhancing public access for all to the Borough’s natural and historic heritage in a managed way which recognises the fragility of these resources (point (h)).
- 6.134 The site of proposed works lies in an area of multi period archaeological potential and fairly complex geology. From discussions with KCC Heritage and in the interest of preserving any archaeological potential a condition has been attached to secure field evaluation works, palaeolithic investigation, recording and reporting, and a programme of post excavation assessment and publication.
- 6.135 Regarding heritage assets the site is within close proximity and forms part of the setting of the Cobdown Farm Ditton Conservation Area, located to the southwest, along with a small number of Grade II listed properties nearby the application site.
- 6.136 The Council’s Conservation Officer has been consulted on the application and has commented on the application. They consider that provided the substantial buffer of trees and shrubbery which divides the site from the conservation area is retained undiminished, the proposal will cause no harm to the significance of the adjacent

designated heritage assets through change within their settings, and there is no objection in terms of impact upon heritage assets.

6.137 The proposed development is therefore not considered to have a detrimental heritage impact and therefore does not warrant refusal on such grounds.

Drainage and Flooding

6.138 Paragraph 170 of the NPPF sets out that *‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.’*

6.139 Paragraph 181 of the NPPF comments that when determining any planning applications, LPAs should ensure that flood risk is not increased elsewhere. Paragraph 182 goes on to state that developments should incorporate sustainable drainage systems.

6.140 Policy CP10 (Flood Protection) of the Council’s Core Strategy ultimately seeks to reduce flood risk and Policy CC3 (Adaptation - Sustainable Drainage) of the Council’s Managing Development and the Environment Development Plan comments that development proposals will not be permitted unless they incorporate sustainable drainage systems (SUDS) appropriate to the local ground water and soil conditions, local drainage regimes and in accordance with the Groundwater Regulations.

6.141 The site lies within Flood Zone 2 and 3a, primarily due to proximity to the Ditton Stream, which runs along the northern boundary of the Cobdown Park site. Various SuDS have been proposed to manage all the runoff from the proposed development and the finished floor levels of the proposed built form to be set to provide appropriate resilience to flood risk.

6.142 The proposed drainage strategy includes:

- Permeable paving for new parking areas;
- A geocellular soakaway system to manage roof runoff from the building;
- Diffuse infiltration across landscaped areas; and
- Exceedance flow routing to the northern portion of the site.

6.143 Importantly, the proposals represent an improvement on the existing drainage arrangement, where roof runoff is currently discharged to the foul sewer. The new system will prevent such discharges, increase site resilience, and provide betterment from both a flood risk and water quality perspective.

6.144 Following discussions with the Environment Agency and KCC Flood and Water Management it is considered that the proposed drainage details and strategy are

appropriate to serve the site and proposed development, subject to conditions, and that the proposal would not significantly increase flood risk elsewhere.

Ecology and Biodiversity Net Gain

- 6.145 Paragraph 187(d) of the NPPF comments that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species.
- 6.146 The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 requires applications “made” on or after the 12 February 2024 to deliver 10% net gain of biodiversity credits.
- 6.147 Policy NE2 (Habitat Networks) of the Council’s Managing Development and the Environment Development Plan sets out that biodiversity of the borough and in particular priority habitats, species and features, will be protected, conserved and enhanced. The restoration and creation of new habitats will be pursued and promoted.
- 6.148 Policy NE3 (Impact of Development on Local Biodiversity) of the Council’s Managing Development and the Environment Development Plan comments that development that would adversely affect biodiversity or the value of wildlife habitats across the borough will only be permitted if appropriate mitigation and/or compensation measures are provided which would result in overall enhancement.
- 6.149 A suite of ecological surveys and assessments have been carried out and submitted in support of the application. These have been prepared by a suitable professional using an appropriate methodology. From discussions with KCC Ecology it is considered that the surveys/assessments and their findings is accepted.
- 6.150 The proposed lighting has been designed to minimise light spill within the site and surrounding area and in principle is not considered to have an unacceptable impact upon wildlife and ecology. To ensure that is the case a condition has been attached.
- 6.151 The Proposed Development will result in an on-site net change of:
- 1.57 habitat units, an increase of 10.25%
  - 2.02 hedgerow units, an increase of 762.24%
  - 0.22 watercourse units, an increase of 12.48%
- 6.152 BNG of at least 10% can be achieved within the site boundary based on the current parameter / illustrative plans. With a 10.25% uplift in habitat units, 762.24% in hedgerow units and 12.48% in watercourse units. A statutory biodiversity net gain obligation is to be secured via a legal agreement.

6.153 Habitats to be created are proposed to be managed and monitored over a 30-year period, with measures in place to assure that adaptation to the management plans can be made should initial approaches fail to deliver habitats that can reach the specified target condition. A condition has been attached to secure a habitat management and monitoring plan.

6.154 From discussions with KCC Ecology and other consultees it is considered that the proposed development would not have an unacceptable impact regarding ecology and would exceed BNG requirements. The proposed development is therefore considered to be policy compliant and is acceptable in terms of ecology and biodiversity net gain.

#### Trees

6.155 Paragraph 136 of the NPPF comments that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning decisions should ensure that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

6.156 Paragraph 187(b) of the NPPF sets out that decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

6.157 Policy NE4 (Trees, Hedgerows and Woodland) of the Council's Managing Development and the Environment Development Plan seeks to ultimately retain and where possible enhance tree and hedgerow coverage along with preserving ancient woodland.

6.158 An Arboriculturally Assessment has been submitted in support of the application, which has been prepared by a suitable professional. The strategy for the proposals seeks to minimise the loss and harm to the existing trees and hedgerows and ensure appropriate buffers and protection measures for retained planting.

6.159 The vast majority of trees on site are proposed to be retained, with extensive new planting proposed across the site including new native trees. The proposed development largely retains the most valuable trees, and any trees proposed to be removed are proposed to be replaced with appropriate replacement, native, planting. The trees proposed to be removed from the site are largely those that are classified as BS Category C or U which are the lower value trees or those which are dead/dying or dangerous. Class U trees would need removing regardless of the proposed development.

6.160 Whilst the proposed development would result in the loss of some trees and planting at the site the proposal also includes additional native planting at the site.

From discussions with the Council's Tree Officer the proposed development is considered acceptable in tree terms subject to conditions.

Residential Amenity

- 6.161 Policy CP1 (Sustainable Development) of the Council's adopted Core Strategy comments that when determining planning applications residential amenity will be preserved.
- 6.162 The proposed development is considered to have the most impact upon the residential properties located to the south/southeast and northeast of the site along Station Road, those to the south along London Road, those to the northwest in Cobdown Park and those to the southwest in Sheldon Court.
- 6.163 By virtue of the scale, orientation, location and separation distance between the proposed built form and neighbouring properties; the proposed development would not be considered to cause an unacceptable loss of light, outlook or privacy to any nearby property.
- 6.164 The proposal would likely result in less disturbance to the surrounding residential properties, when compared to previous use of the site; given the proposed professional nature of the site and operating hours.
- 6.165 Paragraph 198 of the NPPF requires new development to be appropriate to its location when considering the effects of pollution sources including noise and vibration.
- 6.166 Policy SQ6 (Noise) of the Managing Development and the Environment Development Plan Document requires proposals to demonstrate that noise levels are appropriate for the proposed use and respect the surroundings. The policy also identifies that proposals for built development should incorporate design measures such that internal noise levels are in accordance with relevant guidance.
- 6.167 A noise impact assessment has been submitted in support of the application. This has concluded that the development would not be considered to give rise to a significant adverse impact on health and quality of life on existing noise sensitive receptors in relation to noise. This assessment has been reviewed by the Council's Environmental Protection Team who are content with its findings.
- 6.168 Noise arising from the construction phase would be on a temporary basis and that any noise generated can be mitigated through appropriate noise mitigation. Traffic noise is not considered to be significant or excessive in noise levels.
- 6.169 From discussions with the Council's Environmental Protection Team, it is considered that the noise levels generated from the proposed development either once fully operational or during the construction would not be of such a level that would have an unacceptable impact upon the amenity of any nearby residential

property. In any case a condition has been recommended in regard to noise mitigation.

6.170 Based upon the above the proposed development is not considered to have an unacceptable impact upon residential amenity.

#### Air Quality

6.171 Paragraph 199 of the NPPF comments that decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas.

6.172 Policy SQ4 of the Council's Managing Development and the Environment Development Plan Document relates to air quality and sets out that development will only be permitted where the following criteria are met:

- (a) the proposed use does not result in a significant deterioration of the air quality of the area, either individually or cumulatively with other proposals or existing uses in the vicinity;
- (b) proposals would not result in the circumstances that would lead to the creation of a new Air Quality Management Area;
- (c) proximity to existing potentially air polluting uses will not have a harmful effect on the proposed use; and
- (d) there is no impact on the air quality of internationally, nationally and locally designated sites of nature conservation interest or appropriate mitigation is proposed to alleviate any such impact.

6.173 To the south of the site lies the A20 (London Road), which is a designated Air Quality Management Area and covers part of the south of the site.

6.174 The application is supported by an Air Quality Impact Assessment, which has been prepared by a suitable professional. The proposal is considered to be consistent with Paragraph 199, as it will not affect compliance with relevant limit values or national objectives. The proposal is not considered to have a significant detrimental effect on air quality and have no significant residual adverse impacts. It is considered to be compliant with Policy SQ4 of the Management Development and the Environment document as the proposal will not have a significant detrimental effect on air quality and does not lead to the creation of a new AQMA.

#### Energy and Sustainability

6.175 Section 14 of the NPPF requires that planning take a proactive approach to supporting the transition to a low carbon future. New development is expected to reduce greenhouse gas emissions, such as through its location, orientation, and design and through the use of renewable and low carbon energy and heat (Paragraph 164).

6.176 Paragraph 166 of the NPPF states that ‘In determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.’*

6.177 Policy CP1 (Sustainable Development) of the Council’s Core Strategy refers to the need for 10% of energy consumption to be generated on-site from alternative energy sources for proposed developments. Policy CC1 (Mitigation - Sustainable Design) of the Managing Development and the Environment Development Plan Document discusses the requirement for proposed developments to incorporate passive design measure into the design to reduce energy demand. Further noting how developments should be configured, type of ventilation and the use of green roofs to ensure a reduction in energy demand.

6.178 An Energy Strategy has been submitted in support of the application. Key design measures are proposed to be included to achieve the high energy efficiency and low carbon emissions aspiration of the site. The following measures have been proposed to optimise the building performance, and to help reduce carbon emissions and energy consumption:

- High performance thermal envelope
- Passive design measures, including building orientation, overhangs and brise-soleil
- High efficiency LED lighting
- Air Source Heat Pumps serving wet system
- High Efficiency VRF serving heating and cooling
- Natural ventilation with Heat Recovery in appropriate spaces
- High efficiency Mechanical Ventilation with Heat Recovery

6.179 The proposed Performance Campus Building achieves a 5% reduction in carbon emissions against Part L Building Regulations when using the specification outlined in this report. This is in accordance with both national and local planning policies. The energy generation will also surpass the 10% on-site generation required from Policy CP1 of the Council’s Core Strategy.

6.180 A Sustainability Assessment has also been submitted in support of the application. The development will positively contribute to the improvement of both the built and natural environments, being designed in a way that provides a positive relationship between the proposed and the existing urban context.

6.181 The design of the development prioritises materials which have low embodied energy and are sustainably sourced. The proposed sustainability and energy strategy

will result in the proposals being developed in accordance with NPPF section 14 and TMBC Policy CC1.

6.182 A Biodiversity Net Gain of over 10% is to be achieved on site, along with a high standard of water efficiency alongside water recycling and sustainable drainage measures to be put in place. Refurbishment are proposed to be carefully targeted for the Cobdown Park Pavillion, which will also increase efficiency and reduce energy demands.

6.183 Regarding energy and sustainability, the proposed development is considered to result in a highly energy efficient and sustainable development.

#### Community Engagement

6.184 The NPPF at Paragraph 40 references that *'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community.'*

6.185 The applicant sought extensive pre-application advice from the LPA. The applicant has also liaised with the following Parish Councils:

- Ditton Parish Council
- Aylesford Parish Council
- East Malling and Larkfield Parish Council

6.186 In addition, a programme of consultation and engagement activities have included:

- Distribution of 436 consultation leaflets to residents, businesses and organisations in the area surrounding the site, advertising the consultation period, in person events and signposting to the website.
- Two public consultation events (one held at the site, and one held at Ditton Community Centre).
- Meetings with on-site and nearby local residents and businesses.
- A dedicated page on the LCL website, with regular updates on the planning application(s) and copies of the consultation materials.
- Meetings with the MP for Maidstone and Malling, Helen Grant.
- An email and telephone number to receive feedback and answer questions from stakeholders and residents.
- A programme of outreach in the local area with local sports groups and schools.

6.187 The feedback received from these exercises and discussions have aided the development of the scheme now being considered.

#### Legal Agreement and Obligations

6.188 Legislation and Paragraph 58 of the NPPF requires that planning obligations (including legal agreements) should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

6.189 Policy CP25 (Mitigation of Development Impacts) of the Council's Core Strategy comments that all development proposals must either incorporate the infrastructure required as a result of the scheme or make provision for financial contributions and/or land to secure such infrastructure or service provision at the time it is needed, by means of conditions or a planning obligation.

6.190 In this instance the LPA, following discussions with statutory consultees have considered the following obligations to be appropriate:

- Employment and training obligations in relation to:
  - o Local employment and training
  - o Local supply chain commitments
- Travel Plan pursuant to the approved Framework Travel (monitoring fee of £1,422).
- Community Benefits Plan to include but is not limited to:
  - o Use of community 3G pitch
  - o Use of Cobdown Park Pavillion
  - o Use of recreational area
  - o Use of car parking facilities
  - o Use of wider facilities
  - o Details of community outreach and programmes including school outreach, local football clubs' outreach, SEND days and links to education programmes etc
  - o Details of clinics and coaching sessions for local coaches.
- Details of the proposed Community Liaison Officer.
- Setup and operate a Management Board in accordance with the details as part of the Community Benefit Plan for the lifetime of the Development (option for TMBC to be part of the management board).
- Statutory Biodiversity Net Gain obligation.

6.191 These are considered to meet the relevant tests as listed above and the applicant has agreed to these obligations.

#### Other Matters

##### *Land Contamination*

6.192 Paragraph 196(a) of the NPPF sets out that decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. Aim 3(f) of the Council's Core

Strategy seeks to ensure that new development is of a high quality and free from the risks of land contamination.

- 6.193 A Ground Investigation Report has been submitted in support of the applications and no significant contamination of the soils was not encountered and as such no remediation is required.

*Construction Management*

- 6.194 Given its temporary nature little weight can be given to this matter. It is considered that a construction management plan is necessary however in this instance given the scale of the development and the site's location. Therefore, a condition has been recommended. There are also powers to deal with statutory nuisance from noise and disturbance from construction sites through Environmental Health Legislation.

*Security*

- 6.195 Regarding security comments have been received from Kent Police and an informative is attached to ensure that such comments are taken into consideration by the applicant/developer. This application does not however warrant refusal on such grounds.

*Parking on Artificial Pitch*

- 6.196 Comments have been received from Sport England raising concerns regarding vehicle parking and the storage of materials on the artificial pitch proposed to be upgraded as part of this application.
- 6.197 There are presently two contractors working at the site alongside the day-to-day operations of a professional football team. This has resulted in the eastern car being occupied by South East Water whilst works are ongoing to the northeast of the application site and the western car park being occupied by contractors re-laying the first team pitch and improving the internal access road and western car park (approved under 25/00081/PA).
- 6.198 The works to the first team pitch have been carried out over the summer to ensure that the re-laid pitch was ready for the start of the 2025/26 season. These works to the first team pitch and car park and close to completion with the re-laid pitch already being used by the club.
- 6.199 Due to the above situation and time sensitivity parking and the limited storage of materials has therefore taken place on the artificial pitch on a relatively short term and temporary basis. The only realistic alternative to this arrangement would be for users of the site (30+ vehicles daily) to park within the surrounding road network. Several of the surrounding roads have limited parking opportunities or already have high parking pressures.

6.200 Nonetheless this is a separate enforcement matter. This application must be assessed on its own planning merits as set out within the above sections of this report. The application does not warrant refusal on such grounds.

*Minerals and Waste*

6.201 Regarding minerals and waste and safeguarding facilities; KCC Minerals and Waste team have been consulted upon the application and have raised no objections regarding this matter.

*Car Cleaning*

6.202 A request has been made by a local resident for a monthly allowance for car cleaning throughout the construction of the development. This is a civil matter between the club and local residents and not a planning consideration.

Public Sector Equality Duty – Equality Act 2010

6.203 Section 149 of the Equality Act 2010 introduced the Public Sector Equality Duty (PSED), which came into force in April 2011. This duty requires public authorities, including the Council, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

6.204 In the context of planning, equalities considerations are embedded throughout the planning process. This begins with the formulation and adoption of planning policies at the national, strategic, and local levels, including any supplementary planning guidance. These policies are subject to statutory processes that include assessments of their impacts on protected groups.

6.205 For individual development proposals, further consideration is given to the potential equality impacts where relevant. In this case, all relevant policies from the Tonbridge and Malling Development Plan and the National Planning Policy Framework (NPPF) have been considered in the assessment of the application. These policies have been subject to equality impact assessments during their adoption, in accordance with the Equality Act 2010 and prior legalisation and the Council's obligations under the PSED.

6.206 Accordingly, the adopted planning framework used in the assessment of this application is considered to reflect and support the needs of individuals with protected characteristics, as defined by the Equality Act 2010 and previous legislation. These characteristics include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

6.207 The Local Planning Authority can confirm that the application of local and national planning policies in the determination of this planning application has been carried out with due regard to the provisions of the Equality Act 2010.

6.208 In conclusion, it is considered that Tonbridge and Malling Borough Council has had due regard to its duties under Section 149 of the Equality Act 2010 in the assessment of this application and the recommendations set out in this report.

### Conclusion

6.209 In conclusion, when assessed against the requirements of the NPPF, and local policies and having particular regard to the emphasis in the NPPF and NPPG on supporting sustainable development, the development provides significant economic, social and environmental benefits.

6.210 Based on the findings as outlined above, the proposal comprises sustainable development. It would also provide significant public benefits, and overall, the proposed development is considered to be acceptable in the balance of issues discussed within this report. There are not considered to be any other material planning considerations which would indicate a refusal of planning permission.

6.211 All pre-commencement conditions and obligations have been agreed with the applicant's agent.

## **7. Recommendation: APPROVAL** subject to:

7.1 The completion of a legal agreement under section 106 of the Town and Country Planning Act 1990 (as amended) to secure the following:

- Employment and training obligations in relation to:
  - o Local employment and training
  - o Local supply chain commitments
- Travel Plan pursuant to the approved Framework Travel (monitoring fee of £1,422).
- Community Benefits Plan to include but not limited to:
  - o Use of community 3G pitch
  - o Use of Cobdown Park Pavillion
  - o Use of recreational area
  - o Use of car parking facilities
  - o Use of wider facilities
  - o Details of community outreach and programmes including school outreach, local football clubs' outreach, SEND days and links to education programmes etc
  - o Details of clinics and coaching sessions for local coaches.
- Details of the proposed Community Liaison Officer.
- Setup and operate a Management Board in accordance with the details as part of the Community Benefit Plan for the lifetime of the Development (option for TMBC to be part of the management board).

- Statutory Biodiversity Net Gain obligation.

7.2 And subject to the following conditions:

**Conditions**

Time Limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990.

Approved Plans

2. The hereby approved development shall be carried out in strict accordance with the following plans:
  - Site Location Plan- LCLTC-F3A-ZZ-EX-ST-A-089020 S4.P1
  - Recent Planning Applications Overview Plan- LCLTC-F3A-ZZ-EX-ST-A-089021 S4.P1
  - Existing Site Plan- LCLTC-F3A-ZZ-EX-ST-A-089022 S4.P2
  - Proposed Site Plan- LCLTC-F3A-ZZ-EX-ST-A-089023 S4.P2
  - Site Entrance Proposed Layout- LCLTC-F3A-ZZ-EX-ST-A-089025 S4.P1
  - Cobdown Park West Proposed Plan- LCLTC-F3A-ZZ-EX-ST-A-089026 S4.P2
  - Proposed Site Plan – Proposed PROW Diversion- LCLTC-F3A-ZZ-EX-ST-A-089029 S4.P3
  - Diverted PROW Entrance – Existing and Proposed Elevations – LCLTC-F3A-ZZ-EX-EL-A-082511-S4.P1
  - Existing Site Plan – Infrastructure- LCLTC-F3A-ZZ-EX-ST-A-089120 S4.P1
  - Proposed Site Plan – Infrastructure- LCLTC-F3A-ZZ-EX-ST-A-089121 S4.P2
  - Proposed External Signage- LCLTC-F3A-ZZ-EX-ST-A-089221 S4.P1
  - Existing Site Plan – Topographical Survey- LCLTC-F3A-ZZ-EX-ST-A-089320 S4.P1
  - Site Demolition Plan- LCLTC-F3A-ZZ-EX-ST-A-080920 S4.P2
  - Existing Buildings – Ground Floor Demolition Plan- LCLTC-F3A-TC-00-GA-A-080921 S4.P1
  - Existing Buildings – First Floor Demolition Plan- LCLTC-F3A-TC-01-GA-A-080922 S4.P1
  - Existing Buildings – Roof Demolition Plan- LCLTC-F3A-TC-RF-GA-A-080923 S4.P1
  - Existing Buildings – Ground Floor Plan- LCLTC-F3A-TC-00-GA-A-082020 S4.P1
  - Existing Buildings – First Floor Plan- LCLTC-F3A-TC-01-GA-A-082021 S4.P1
  - Existing Buildings – Roof Plan- LCLTC-F3A-TC-RF-GA-A-082022 S4.P1
  - PC Building – Proposed Ground Floor Plan- LCLTC-F3A-TC-00-GA-A-082023 S4.P1

- PC Building – Proposed First Floor Plan- LCLTC-F3A-TC-01-GA-A-082024 S4.P1
- PC Building – Proposed Roof Plan- LCLTC-F3A-TC-RF-GA-A-082025 S4.P1
- Security Lodge Proposed Drawings- LCLTC-F3A-SL-00-GA-A-082026 S4.P1
- Pitch Plant Room Proposed Plan- LCLTC-F3A-PP-00-GA-A-082030 S4.P1
- Cobdown Park Pavilion- LCLTC-F3A-AP-ZZ-GA-A-082040 S4.P1
- Cobdown Park Pavilion – Proposed Plans- LCLTC-F3A-AP-ZZ-GA-A-082041 S4.P1
- Grounds Maintenance Building – Proposed- LCLTC-F3A-GM-ZZ-GA-A-082050 S4.P2
- Site Entrances – Existing and Proposed Elevations- LCLTC-F3A-ZZ-EX-EL-A-082522 S4.P1
- PC Building – Existing and Proposed Elevation AA- LCLTC-F3A-TC-ZZ-EL-A-082522 S4.P1
- PC Building – Existing and Proposed Elevation BB- LCLTC-F3A-TC-ZZ-EL-A-082523 S4.P1
- PC Building – Existing and Proposed Elevation CC, DD and EE- LCLTC-F3A-TC-ZZ-EL-A-082524 S4.P1
- PC Building – Existing and Proposed Elevation FF, GG and HH- LCLTC-F3A-TC-ZZ-EL-A-082525 S4.P1
- PC Building – Proposed Materiality- LCLTC-F3A-TC-ZZ-EL-A-082526 S4.P1
- Cobdown Park Pavilion- LCLTC-F3A-AP-ZZ-GA-A-082540 S4.P1
- Cobdown Park Pavilion- LCLTC-F3A-AP-ZZ-GA-A-082541 S4.P1
- Grounds Maintenance Building- LCLTC-F3A-GM-ZZ-EL-A-082550 S4.P2
- Site Sections AA and BB- LCLTC-F3A-ZZ-EX-SE-A-082620 S4.P1
- Site Section CC- LCLTC-F3A-ZZ-EX-SE-A-082621 S4.P1
- Site Sections DD and EE- LCLTC-F3A-ZZ-EX-SE-A-082622 S4.P1
- PC Building – Section AA- LCLTC-F3A-TC-ZZ-SE-A-082623 S4.P1
- Landscape Strategy- 2606-TFC-XX-XX-DR-L-1001 P04
- Western Area- 2606-TFC-XX-XX-DR-L-1002 P04
- Fencing Strategy- 2606-TFC-XX-XX-DR-L-2001 P04

Reason: For avoidance of doubt and in the interests of proper planning.

Construction Environmental Management Plan

3. Prior to commencement of works within a phase a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include details of the following:
  - A programme for carrying out the works, including set up, preparation and clearance of the site;
  - Details of the number and frequency of construction vehicle movements;

- Construction vehicle routes to and from and within the site with distance details;
- A construction workers' travel plan;
- A detailed traffic management plan to control traffic during the construction phases;
- Details of on-site parking and site operatives', contractors and construction vehicles;
- Details of any temporary buildings, enclosures, staff facilities and site hoardings (where required);
- Measures to minimise and control noise, vibration, dust, odour, exhaust, smoke and fumes during construction including compliance with a maximum noise level to be agreed with the Local Planning Authority;
- Provision and details of wheel washing facilities;
- Measures to minimise the potential for pollution of groundwater and surface water;
- Measures to prevent the discharge of surface water onto the highway;
- Measures to protect ecology, including the following measures based on the submitted Ecology Impact Assessment by Logika, dated 25th July 2025:
  - The identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;
  - Detailed design(s) and/or working method(s) necessary to achieve stated objectives;
  - Extent and location of proposed works (including receptor areas(s) in case animals are encountered during development) shown on appropriate scale maps and plans for all relevant species and habitats;
  - Reference to the relevant protected species licences (e.g., badgers and dormice) to be obtained in advance of site clearance/construction and any relevant mitigation measures required;
  - Reference to any Environment Agency permits required and any relevant mitigation measures required;
  - Reference to or inclusion of a detailed arboricultural method statement to protect retained trees;
  - Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
  - Persons responsible for implementing the works, including times during construction when specialist ecologists need to be present on site to undertake / oversee works; and
  - Disposal of any wastes for implementing work.
- Measures to protect trees, woodland and planting;
- Details of buffer zone planting;
- Mitigation against surface water runoff to flood sensitive ecological receptors and the highway;
- Details for soil management in accordance with the DEFRA construction code of practice for sustainable use of soils on construction sites;

- Details of the storage and removal of any spoil from the site including likely number of vehicle trips; and
- The arrangements for public consultation and liaison during the construction works.

The approved CEMP shall be fully complied with throughout the demolition and construction period of each phase.

Reason: These details are required prior to the commencement of development of each phase in the interests of minimising the impact of the development during the construction phase.

#### Phasing Plan

4. Prior to the commencement of development (excluding site preparation works and demolition), a phasing plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the plan thereby approved.

Reason: To allow the Local Planning Authority to understand how the development will come forward.

#### Site Management Plan

5. Prior to the first use of the proposed development a Site Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include details of access arrangements for adjoining residents and businesses. The development shall thereafter be carried out in accordance with the approved details unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure appropriate management of the site and suitable access arrangements for residents and businesses.

#### Landscape Management Plan

6. Prior to the commencement of landscaping works (excluding site preparation works and demolition) a Landscape Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The content of the Landscape Management Plan shall include the following:
  - Description and evaluation of features to be managed;
  - Ecological trends and constraints on site that might influence management;
  - Aims and objectives of management;
  - Appropriate management options for achieving aims and objectives;
  - Schedule of works including timings and responsible parties for the implementation; and
  - Creation and enhancement of habitats.

The landscaping works shall thereafter be carried out and managed in accordance with the approved details.

Reason: To ensure protection and enhancement of the landscape and ecology as part of the development.

Importing and Exporting Soil

7. Prior to the commencement of the development (except for site preparation works and demolition) details of the importing and exporting of soils or sub soils from or to the site shall be submitted to and approved in writing by the Local Planning Authority. Any soils and other materials taken for disposal should be in accordance with the requirements of the Waste Management, Duty of Care Regulations. Any soil brought on site should be clean and a soil chemical analysis shall be provided to verify imported soils are suitable for the proposed end use.

Reason: These details are required prior to the commencement of development in order to protect the amenity of the locality.

Tree Protection and Method Statement

8. No development (including any temporary enabling works, site clearance and demolition) or development shall take place until a dimensioned tree protection plan in accordance with Section 5.5 and a site specific arboricultural method statement detailing precautions to minimise damage to trees in accordance with Section 6.1 of British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations) have been submitted to and approved in writing by the Local Planning Authority. The submitted document shall be based on and expanding upon the principles of the Arboricultural Impact Assessment report by Alltree consultancy dated August 2025 and include full and finalised details relating to the precautions and methodologies to be used during construction works to prevent/minimise damage to retained trees.

No site works (including any temporary enabling works, site clearance and demolition) or development shall take place until the temporary tree protection shown on the tree protection plan approved under this condition has been erected around existing trees on site. This protection shall remain in position until after the development works are completed and no material or soil shall be stored within these fenced areas at any time. The development shall be implemented in accordance with the protection plan and method statement as approved under this condition.

Reason: To safeguard the health of existing trees which represent an important amenity feature.

Services (Trees)

9. No development (except site preparation works and demolition) shall take place until details of the location, extent and depth of all excavations for services (including but not limited to electricity, gas, water, drainage and telecommunications) in relation to trees on and adjacent to the site have been submitted to and approved in writing by the Local Planning Authority.

The development shall thereafter be implemented in accordance with the approved details unless otherwise agreed in writing with the Local Planning Authority.

Reason: To safeguard the health of existing tree(s) which represent an important amenity feature.

Approval of Site Levels

10. Prior to commencement of development (excluding site preparation works), details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s) and any other changes proposed in the levels of the site must be submitted to and approved in writing by the Local Planning Authority.

The development shall thereafter be implemented in accordance with the details as approved under this condition and retained as such thereafter.

Reason: To ensure that the development is carried out at suitable levels in relation to the highway and adjoining land having regard to drainage, gradient of access, the safety and amenities of users of the site, the amenities of the area and the health of any trees or vegetation.

Geo-archaeological Field Evaluation

11. Prior to the commencement of development (excluding site preparation works and demolition) the following will be submitted to and approved by the Local Planning Authority:

- i) geo-archaeological field evaluation works in accordance with the submitted specification and written timetable;
- ii) further geo-archaeological and Palaeolithic investigation, recording and reporting, determined by the results of the evaluation, in accordance with the specification and timetable; and
- iii) programme of post excavation assessment and publication.

Reason: To ensure that features of Palaeolithic archaeological interest are properly examined, recorded, reported and disseminated.

Archaeological Field Evaluation Works

12. Prior to the commencement of development (excluding site preparation works and demolition) the following will be submitted to and approved by the Local Planning Authority:

- i) archaeological field evaluation works in accordance with the submitted specification and written timetable;
- ii) further archaeological investigation, recording and reporting, determined by the results of the evaluation, in accordance with the specification and timetable; and
- iii) programme of post excavation assessment and publication.

Reason: To ensure that features of archaeological interest are properly examined, recorded, reported and disseminated.

#### Surface Water Drainage

13. Prior to commencement of development (excluding site preparation works and demolition) within a phase a detailed sustainable surface water drainage scheme must be submitted to and approved by the Local Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment and Drainage report dated 25.07.2025. The submitted scheme shall demonstrate the following:

- that the surface water generated by the development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of within the curtilage of the site without increase to flood risk on or off-site;
- that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site;
- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters; and
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding in accordance with technical standards and published guidance at the time of submission.

#### Floodplain Compensation Strategy

14. Prior to commencement of development (excluding site preparation works and demolition) a flood compensation strategy based on topographic information to

metres Ordnance Datum (mAOD), that demonstrates no increase in flood level under the following flood event conditions must be submitted to and approved by the local planning authority:

- 3.3% AEP;
- 1% AEP and
- 3.3% + 37% increase flow.

Reason: To ensure no increase in flood risk to adjacent property.

#### Habitat Management and Monitoring Plan

15. Prior to the commencement of development (excluding site preparation works and demolition) a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan, and based on up-to-date ecology surveys as determined by a suitably qualified ecologist, must be submitted to and approved by the local planning authority and must include:

- a) a non-technical summary;
- b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) the planned habitat retention, creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- e) the monitoring methodology and frequency in respect of the retained, created or enhanced habitat to be submitted to the local planning authority.

The retained, created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP. Remedial measures, if required, shall be specified within an updated HMMP submitted for approval in writing by the local planning authority at the same time as the submission of each monitoring report.

Reason: To ensure the development delivers the required biodiversity net gain on site in accordance with Local Policy and Schedule 7A of the Town and Country Planning Act 1990.

#### External Materials

16. Prior to the commencement of any above ground works of the development, details of the proposed external facing materials to be used for each building shall

be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In the interest of good design and to ensure that the development does not harm the character and appearance of the area of the visual amenity of the locality.

Secure by Design

17. No development above ground level shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority setting out the measures to be taken to demonstrate compliance with the principles of Secure by Design. The development shall be carried out and thereafter maintained in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development seeks to address measures for the prevention of crime.

Noise Mitigation

18. Prior to commencement of any above ground works a Noise Mitigation Strategy must be submitted to and approved in writing by the Local Planning Authority.

Reason: To preserve surrounding residential amenity.

External Lighting

19. Prior to commencement of works above ground level, a lighting plan which has been designed to minimise impacts on biodiversity shall be submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as ISO lux plan(s) showing light spill. It shall be clearly demonstrated that areas to be lit shall not impact protected species or their habitats. All external lighting shall be installed in accordance with the specifications and locations set out in the approved plan and be maintained thereafter.

All external lighting shall be installed strictly in accordance with the approved plans. Any additional lighting must be submitted to and approved in writing by the Local Planning Authority.

Reason: To limit the impact of light pollution from artificial light in accordance with Paragraph 198(c) of the National Planning Policy Framework 2024 and to ensure the development does not harm the visual amenity of the locality.

Floodlighting Hours

20. The external floodlights hereby approved shall be used only when necessary to do so and only when the pitches are in use. The external floodlights must be switched off by 21:00 (with a half an hour buffer until 21:30), and, apart from maintenance shall remain switched off at all other times unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of visual and residential amenity of the locality.

Verification Report

21. No building within any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of Paragraph 182 of the National Planning Policy Framework 2024.

Infiltration

22. Where infiltration is to be used to manage the surface water from the development hereby permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

Reason: To protect vulnerable groundwater resources and ensure compliance with the provisions of the National Planning Policy Framework 2024.

Unidentified Contamination

23. (a) If during development works, significant deposits of made ground or indicators of potential contamination are discovered, the works shall cease until an investigation / remediation strategy has been agreed with the Local Planning Authority and it shall thereafter be implemented by the developer.

(b) Any soils and other materials taken for disposal should be in accordance with the requirements of the Waste Management, Duty of Care Regulations. Any soil

brought onsite should be clean and a soil chemical analysis shall be provided to verify imported soils are suitable for the proposed end use.

(c) A closure report shall be submitted by the developer relating to (a) and (b) above and other relevant issues and responses such as any pollution incident during the development.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

#### Cycle Parking

24. Prior to first use of the development, details of cycle parking must be submitted to and approved by the Local Planning Authority. Thereafter the approved cycle parking shall be fully implemented, retained and used only for the purposes of cycle parking.

Reason: In the interests of promoting cycling as a sustainable means of travel.

#### EV Charging Points

25. Prior to first use of the hereby approved development, details of electric vehicle charging points shall be submitted and approved in writing by the Local Planning Authority. The electric vehicle charging points shall be fully implemented in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure provision is made for the use of electric vehicles as a sustainable means of travel.

#### Delivery and Servicing Plan

26. Prior to first use of the development, a detailed Deliveries and Servicing Plan which shall include details of site delivery times and arrangements shall be submitted to and approved in writing by the Local Planning Authority. The approved plan shall be implemented in full unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that appropriate arrangements are in place to ensure detrimental impacts are minimised.

#### Hours of Operation

27. Prior to first use of the hereby approved development, details of the hours and operations shall be submitted and approved in writing by the Local Planning Authority. The site shall therefore operate in accordance with the approved hours of operation.

Reason: In the interest of residential amenity.

Car Parking Management Plan

28. Prior to the use of each phase of the proposed development a Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Car Parking Management Plan must include details of how the car parking across the site will be allocated and managed.

Reason: To ensure the provision of appropriate car parking for the management of the site and highway safety and convenience.

Sports Pitch Maintenance

29. Within 6 months of practical completion of the conversion to the 3G artificial grass pitch, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority in consultation with Sport England. This shall include measures to ensure the replacement of the Artificial Grass Pitch within the manufacture's specified period. It should also include the required testing to comply with FIFA Quality certification. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the sports lit 3G artificial grass pitch.

Reason: To ensure that a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport.

Design and Layout of 3G Artificial Grass Pitch

30. No development shall commence on the hereby approved artificial pitch, until details of the design and layout of the containment of the 3G artificial grass pitch have been submitted to and approved in writing by the Local Planning Authority in consultation with Sport England. The artificial grass pitch shall not be constructed other than in accordance with the approved details.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy.

3G Artificial Grass Pitch Certification

31. Within 6 months of practical completion of the 3G artificial grass pitch, the following must be submitted to and approved by the Local Planning Authority:
- a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and

- b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority after the consultation with Sport England.

Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy.

Site and Footpath Boundary

- 32. Prior to the commencement of use of the proposed diverted Public Right of Way a scheme of works shall be submitted to and approved in writing by the local planning authority (in consultation with National Highways). The scheme of works shall include such necessary surveys and proposals to repair, replace or augment the current non National Highways boundary features along the northern perimeter of the site within the applicant's control to as far as is reasonable prevent users of the proposed footpath from straying onto the strategic road network. The works shall be implemented in full accordance with the approved scheme and maintained thereafter to meet their stated purpose.

Reason: To ensure that the M20 Motorway continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and Paragraph 115 of the National Planning Policy Framework 2024.

Ball-Stop Fencing

- 33. The hereby approved development shall be carried out in strict accordance with the ball-stop fencing shown on approved plan: Fencing Strategy- 2606-TFC-XX-XX-DR-L-2001 P04 and shall not be varied unless otherwise agreed in writing with the Local Planning Authority. The fencing shall be fully implemented prior to the first use of the development and maintained in perpetuity.

Reason: To ensure that the M20 Motorway continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and Paragraph 115 of the National Planning Policy Framework 2024.

Public Art Strategy

- 34. Prior to first use of the development a Public Art Strategy shall be submitted to and approved in writing by the Local Planning Authority. The approved Public Art shall be implemented in full accordance with what is set out in the approved strategy.

Reason: In the interest of visual amenity.

Hard and Soft Landscaping

35. Prior to the commencement of landscaping works, a scheme of hard and soft landscaping, including details of existing trees to be retained and size, species/cultivar, planting heights, densities and positions of any soft landscaping; the design of access to the public right of way and associated surfacing, widths, gradients, landscaping and structures and details of any signage, shall be submitted to and agreed in writing by the Local Planning Authority.

The approved scheme of landscaping shall be carried out before the end of the first planting and seeding season following occupation of any part of the buildings or completion of the development, whichever is sooner, or commencement of the use.

Any existing tree shown to be retained or trees or shrubs to be planted as part of the approved landscaping scheme which are removed, die, become severely damaged or diseased within five years of the completion of development shall be replaced with trees or shrubs of appropriate size and species in the next planting season.

Reason: In the interests of visual amenity and trees.

#### Removal of Permitted Development Rights

36. Under the Town and Country Planning General Permitted Development Order (2015), the development shall not undergo any change of use under Schedule 2, Part 3 of the GDPO (2015) (as amended), unless otherwise agreed in writing with the Local Planning Authority.

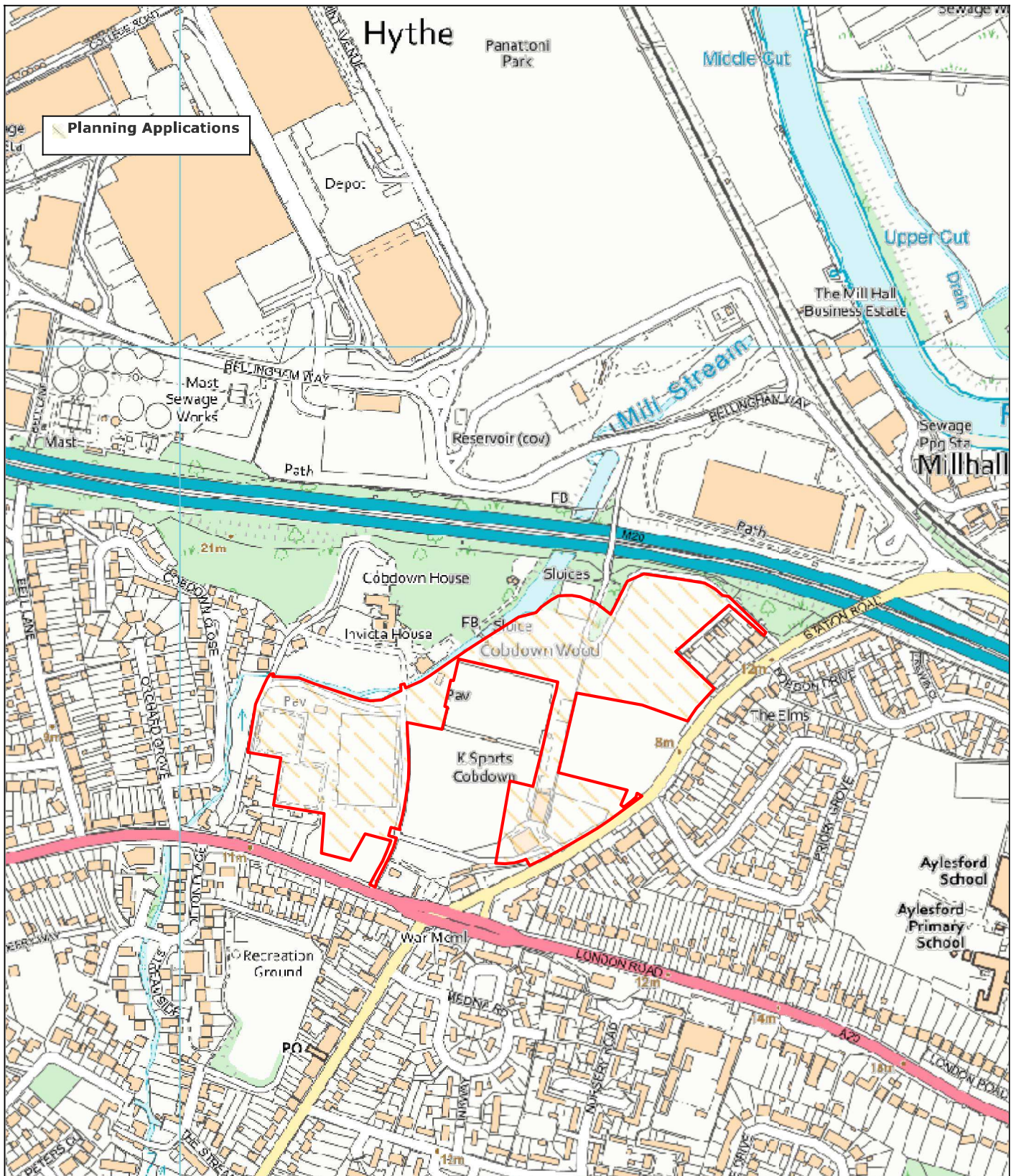
Reason: The proposal was determined on the basis of the information provided for the proposed uses set out in the application.

#### **Informatives**

1. Separate consent is required to divert the existing Public Right of Way which must be secured before commencement of any phase of development that requires the disturbance of the PRow. Any new route must be provided to the certifiable standard, certified by the Highways Authority.
2. There is a duty for the principal contractor “to take reasonable steps to prevent access by unauthorised persons to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.
3. Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority.
4. It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway. Any changes to or affecting the

public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC) via a s278 Agreement under the Highways Act 1980 with KCC as local highway authority. Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established.

5. It is the responsibility of the applicant/developer to ensure that all of the relevant permissions are granted by South East Water/Thames Water prior to works commencing including any landscaping proposals in proximity to public apparatus.
6. It is the responsibility of the applicant/developer to ensure that all necessary licences, permits and permissions are obtained from Natural England prior to works commencing.
7. During the demolition and construction phases, the hours of noisy working (including deliveries) likely to affect nearby properties should be restricted to Monday to Friday 07:30 hours - 18:30 hours; Saturday 08:00 to 13:00 hours; with no such work on Sundays or Public Holidays.



**Planning Applications 25/01319/PA**

**Scale: 1:5000**



Tonbridge & Malling Borough Council  
Gibson Building, Gibson Dr  
Kings Hill, West Malling  
ME19 4LZ  
Tel.: +44 1732 844522



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### Planning Committee Area 3

#### Planning Appeal Decisions for Area 3

|                                     |                                                                                                                                                                                                                                                                 |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| TMBC Ref                            | 23/03168                                                                                                                                                                                                                                                        |
| PINS Ref                            | APP/H2265/W/24/3349987                                                                                                                                                                                                                                          |
| Site Address                        | THE PADDOCK, Rochester Road, Burham, Rochester, ME1 3SQ                                                                                                                                                                                                         |
| Description of development          | Change of use of land to use as a residential caravan site for one Gypsy family with two caravans, including no more than one static caravan/mobile home, together with laying of hardstanding and erection of ancillary amenity building (Retrospective works) |
| Delegated or Committee Decision     | Delegated Decision                                                                                                                                                                                                                                              |
| Appeal Outcome                      | Split Decision 24 June 2025                                                                                                                                                                                                                                     |
| <i>Insert hyperlink to decision</i> | <a href="#">Appeal Decision</a>                                                                                                                                                                                                                                 |
| Costs Awarded                       | n/a                                                                                                                                                                                                                                                             |

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The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

**ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT  
INFORMATION**

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