

**Stansted
Pilgrims With Ightham**

02 APRIL 2025

TM/24/01620

Location: The London Golf Club South Ash Manor, South Ash Road, Ash, Sevenoaks, TN15 7EN

Proposal: Cross boundary application:
Proposals within the Tonbridge and Malling Borough Council area:
Erection of a hotel with spa and conference facilities, and visitor accommodation lodges, associated parking and landscaping located to the west of Ash Lane. An underpass under Ash Lane connecting the main golf club site with the eastern parcel. A sports pavilion (comprising a restaurant, gym and studios), racket courts and a swimming lake; visitor accommodation lodges and a new relocated driving range and Elite Performance Centre located to the east of Ash Lane along with associated parking and landscaping. Change of use of Grade II* listed South Ash Manor and adjacent stables block from office use to visitor accommodation. Refurbishment of Grade II* listed South Ash Manor including internal and external alterations and demolition of conservatory.
Proposals within the Sevenoaks District Council area:
Erection of visitor accommodation lodges and landscaping located to the west of Ash Lane. Demolition of the existing building within the southern parcel and redevelopment of land into a sports turf academy with associated surfaces and an artificial pitch. New equestrian facilities including an arena and replacement stables. Change of use of Grade II* listed South Ash Manor and adjacent stables block from office use to visitor accommodation. Refurbishment of Grade II* listed South Ash Manor including internal and external alterations and demolition of conservatory.

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Summary of Reasons for Recommendation

- The proposal would result in the delivery of sustainable development and therefore, in accordance with Paragraph 11 of the NPPF, permission should be granted, subject to all other material considerations being satisfied.
- The development would be in accordance with both national and local policy.
- The proposal would provide significant economic benefits.
- The development would support the local visitor economy and provide a significant amount of tourist accommodation within the borough.
- The development would provide significant employment opportunities both through construction and once operational.
- The proposed development would create training and qualification opportunities.
- The proposal would provide significant heritage benefits including the restoration of a Grade II* listed building.
- The proposed development would provide social benefits.
- The development would not have a detrimental impact upon highway safety.
- The proposal would result in enhancements to a nearby Public Right of Way.
- There are no outstanding statutory consultee objections.

- The development would provide 20% biodiversity net gain on site along with landscape, woodland and habitat management.
- The delivery of state of the art sporting facilities that would contribute to the established sports uses within the surrounding area.
- along with landscape, woodland and habitat management
- The proposal is of a high-quality design which is respectful of the site's context and setting.
- The development is highly carbon and energy efficient achieving 48% in carbon reductions.
- Adequate on-site vehicle parking, cycle parking and EV parking provisions along with a shuttle bus service would be provided to support the development.
- The proposal would not result in an unacceptable impact upon drainage and flood risk in the locality.
- The development would not have a detrimental impact upon the residential amenity of any neighbouring properties.
- The development would not have an unacceptable impact upon wildlife and ecology.
- The development would bring about community benefits both on and off site including securing a community benefits plan.
- The proposed development would not have an unacceptable tree impact.
- There are no other material considerations which would warrant refusal of planning permission.

1. Description of Proposal:

Overview

- 1.1 The application relates to the London Golf Club and associated parcels of agricultural and equestrian land. For the purpose of this application and report the site has been subdivided into the following areas/locations:
- Central Cluster (comprising the club house, South Ash Manor and other existing buildings)
 - Eastern Parcel (agricultural land located to the east of Ash Lane)
 - Western Parcel (land to the west of Ash Lane predominantly comprising a driving range)
 - Southern Parcel (situated to the north of the A20 and south of Stansted Lane predominantly comprising horse grazing land)
 - Equestrian Parcel (equestrian land to the immediate east of the M20 and north of the A20)
- 1.2 These areas are described in greater detail within 'The Site' section of the report.
- 1.3 The application seeks full planning permission for the following components:
- Hotel and lodge accommodation (western and eastern parcels)
 - Sports pavilion and pursuits area (eastern parcel)
 - Driving range and Callaway elite performance centre (eastern parcel)
 - Wedding venue, accommodation and facilities (central cluster)
 - Sports turf academy (southern parcel)

- Existing clubhouse improvements (central cluster)
- Equestrian facilities (equestrian parcel)

Environmental Impact Assessment

- 1.4 The proposed development falls within Schedule 2 10 (b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and as such has been subject to Environmental Impact Assessment (EIA).
- 1.5 As such, an Environmental Statement (ES) has been submitted as part of the application. This is prepared to assess the environmental effects of the development in line with the statutory requirements contained within the regulations. The purpose of the ES is to inform decision making by explaining the likely significant effects that the development may have on the environment during construction and once it is complete and how they can be avoided or reduced. The EIA has been informed by a series of technical studies which form part of the ES. These studies include surveys, calculations and other forms of modelling as necessary.
- 1.6 The Environmental Impact Assessment covers the following areas: socio-economics, transport and access, air quality, noise, cultural heritage, biodiversity, climate change and greenhouse gases, light pollution, effect interactions, mitigation, monitoring, residual effects and landscape and visual impact. Each topic assessment is designed to attach a level of significance to the identified effects (both positive and negative), i.e. either major, moderate, minor or negligible. Short and long-term (temporary and permanent), direct and indirect effects have been assessed. The EIA Regulations require that 'cumulative' effects are also considered in the ES. 'Residual effects' are defined as those that remain after mitigation measures have been implemented.
- 1.7 The submitted ES meets the requirements of the EIA regulations. On this basis the contents and conclusions contained within the ES are considered throughout the detailed assessment of the scheme which follows.

Cross Boundary Application

- 1.8 The application site sits partly within both the boundaries of Tonbridge and Malling Borough Council (TMBC) and Sevenoaks District Council. A concurrent application under reference 24/02712/FUL has thus been submitted to Sevenoaks District Council (SDC) for determination. This application is presently under consideration.

Hotel and Lodge Accommodation

- 1.9 The application seeks permission for the erection of a hotel (Class C1) comprising of 240 rooms, a spa, gym, restaurant and bar, conference facilities and associated parking and the erection of a total of 78 lodges at the site (Class C1).
- 1.10 Access to the hotel and lodges is proposed to be via the existing main access from Stansted Lane, where guests will drive up to the main entrance of the hotel where they are proposed to be met by a concierge who will park their car in one of the car parking areas. Access to the lodges is proposed to be via golf buggy or on foot as

cars will not be permitted to drive around the network of internal roads. Guests will also be able to use golf buggies to access the on-site facilities including the existing clubhouse, proposed driving range and pavilion on the other side of Ash Lane via a previously consented and proposed underpass.

Hotel (solely within TMBC)

- 1.11 The hotel is proposed to be sited within the western parcel of the application site in an area of grassland/shrubland located to the immediate south of the existing driving range. The hotel is proposed to be in the same location as a previously consented (and extant permission) 130-bedroom hotel (approved under 09/03149/FL).
- 1.12 The previously approved hotel building was of a more traditional design whereas the now proposed scheme is much more contemporary, and landscape led proposal. The now proposed hotel is modern in appearance with a smooth lined curved building design, which includes gentle bends and arcs to the external elements of the building as well as the interior design. The now proposed hotel includes a green roof and seeks to be much more efficient in both energy and use of space/land than that previously permitted at the site.
- 1.13 The hotel is to comprise of five levels and seeks to utilise and follow the existing topography of the site with the concept of a series of terraces stepping up the sloping land levels being proposed and is proposed to incorporate a green roof. The terraces are proposed on the west facing elevation overlooking with the main entrance to the building, along with a separate spa entrance being located on the east facing elevation. Drop-off and parking provisions and located to the east of the proposed hotel entrance points.
- 1.14 The main entrance to the proposed hotel is to be situated on the east facing elevation at ground floor level. The entrance leads into a spacious circulation space and reception area with a central void above. The ground floor level also proposes to host a restaurant, lounge areas and bar all leading onto a spacious west facing terrace. The ground floor is also proposed to provide a salon, a gym and the proposed spa facilities situated in the northern end of the building. An additional entrance is proposed to serve the spa and associated facilities on the east facing elevation; situated to the north of the proposed main entrance. The spa facilities include an indoor and outdoor pool, treatment rooms, a relaxation room along with a café and lounge area. A shop and co-working meeting space are also proposed to be provided at ground floor level of the building.
- 1.15 The topography of the land allows for a basement/lower ground floor level which is not visible from the eastern side of the proposed building but is from the west where openings are proposed. The basement level is proposed to accommodate a central conference room which opens out the west along with three function rooms, toilet facilities, a champagne bar, cloakroom, wine cellar, kitchen areas and staff office and facilities. The southern part of the basement level is proposed to host loading bays, storerooms, back of house rooms and plant rooms.

- 1.16 The upper floors of the proposed hotel are to host the accommodation. The first-floor level is proposed to host 102 rooms (including 9 min suites), the second floor is proposed to comprise 97 rooms (including 9 mini suites) and the third floor is proposed to be made up of 41 rooms (all suites).
- 1.17 The proposed immediate external areas around the proposed hotel, such as terraces are proposed to be served by bollard lighting. Balconies to the rooms on the upper floors are proposed to be served by low level wall lighting.
- 1.18 The below table (Table 1) provides a summary of the proposed hotel along with a brief comparison against that of the previously approved and extant hotel.

Table 1: Hotel

	Approved under 09/03149/FL	Proposed	Change +/-
No. of hotel rooms	130	240	+110
No. of storeys	4	5	+1
Max height	19.7m	19.2m	-0.5m
Floorspace	18,0306sqm (GIA)	25,604sqm (GIA)	+7,298sqm (GIA)

Lodges (73 'Retreat Lodges' within TMBC and 5 'Woodland Lodges' within SDC)

- 1.19 Permission is sought for the erection of 78 lodges of the site with 73 being situated within TMBC. The lodges within TMBC are proposed to be sited within both the eastern and western parcels of land located either side of Ash Lane. 24 lodges are proposed to be located on the western parcel of the application site, to the north of the proposed hotel, and largely on the footprint of an existing driving range. The remaining 51 lodges proposed with TMBC are to be sited in the eastern parcel on what is presently agricultural land but has extant permission under 12/01290/FL for a 9 hole golf course.
- 1.20 5 'Woodland Lodges' are proposed to be sited within a clearing, bounded by ancient woodland, to the south of the proposed hotel and to the east of the properties of nos 1 and 2 Bouts Cottage (situated along Ash Lane). These lodges are situated solely within SDC.
- 1.21 The proposed lodge form of accommodation is similar to that of the proposed hotel suits, but with a greater amount of accommodation more suitable for groups staying at the site. Each lodge is proposed to have its own covered buggy and electric bike parking. The lodges are not proposed to be accessible by car and bollard lighting is generally proposed in the lodge areas.

Retreat Lodges (solely within TMBC)

- 1.22 Three different types of retreat lodges are proposed varying in size from 2-4 bedrooms. The mix of lodge sizes and types are to be distributed across the eastern and western parcels. All the proposed lodge types host a generous kitchen, living

and dining spaces. Some lodges are also proposed to provide ground floor bedroom accommodation to not exclude any groups or individuals.

Table 2: Retreat Lodges

	Lodge Type 1	Lodge Type 2	Lodge Type 3
No. of lodges	26	22	25
No. of bedrooms	2	3	4
No. of storeys	2	2	2
Max height	8.1m	8.1m	8.1m

Woodland Lodges (solely within SDC)

- 1.23 Two types of woodland lodge are proposed in the form of 3 x 4 bed accommodation ('Ground Lodges') and 2 x 2 bed accommodation ('Treehouses'). The ground lodges seek to utilise and sit within the existing topography of the site and follow the curve of the clearing with the treehouse style accommodation proposed to sit relatively centrally in this part of the site. Both accommodation types are based over a single level with the treehouses comprising a small number of pods.

Sports Pavilion and Pursuits (solely within TMBC)

- 1.24 The application includes the erection of a sports pavilion building and the creation of a pursuits area (Class F2) in the eastern parcel of the application site, to the east of Ash Lane. The proposed facilities are proposed to be accessed via an underpass from the existing golf club site to the west of Ash Lane.

Sports Pavilion

- 1.25 The proposed sports pavilion building is to be sited to the south of a public bridleway (MR604), be largely rectangular in shape with an undulating green roof and front to the south. A summary table (Table 3) is shown below. The building is effectively divided into two buildings which sit either side of a proposed main entrance walkway and connected by the green roof. The proposed entrance walkway provides views of the proposed pursuits (to be situated to the immediate south of this building) and beyond.

Table 3: Sports Pavillion

	Proposed
No. of storeys	1
Max height	5.9m
Floorspace	1,933sqm (GIA)

- 1.26 The western part of the proposed building is to comprise a restaurant and bar, which spills onto a proposed terrace area. The easter part of the building is proposed to host a gym which overlooks the adjacent pursuits to the south, two studio spaces, a sporting shop along with changing facilities.

1.27 To the immediate east of the proposed sports pavilion a kids club is proposed, which has its own access and entrance to the north and south. To the immediate east an enclosed external play space is proposed.

Pursuits

1.28 Pursuits are proposed to the south of the proposed sports pavilion and include the following:

- A natural swimming lake
- 3 x tennis courts
- 4 x padel courts

1.29 The swimming lake is proposed to wrap around the edge of the tennis courts. A Lakehouse is also proposed to serve the swimming lake, which is located at the southern end of the pavilion axis and accommodates a small level of changing facilities. The proposed padel and tennis courts are proposed to be floodlit.

1.30 The sports pavilion and pursuits area are proposed to be available for use by the hotel and lodge guests, Golf Club members as well as to the general public on a membership basis. The restaurant and bar facilities will be available to all.

Driving Range and Callaway Elite Performance Centre (solely within TMBC)

1.31 The application seeks permission to relocate the existing driving range to a parcel of land located to the east of Ash Lane in the northern section of the eastern parcel of the application site. The existing driving range, presently situated on land to the west of Ash Lane, is proposed to accommodate the proposed hotel along with some of the proposed lodge accommodation. The driving bays and built form to serve this element are proposed to be situated in the south of this parcel of land and front towards the northeast.

1.32 Permission was previously granted in this part of the application site in 2013 (under 12/01290/FL) for the relocation of the driving range. This permission is extant and could therefore still be implemented. It is proposed to locate the new driving range within the same location as the previously consented driving range.

1.33 The proposed driving range building is single storey with a low curving form and green undulating roof in keeping with the proposed pursuits building. In addition to driving range bays and studios a lounge area, putting studio, office, reception, stores and changing facilities are also proposed. Adjoining the driving range building a new training centre is proposed, referred to as the Callaway Elite Performance Centre. A summary table (Table 4) is shown below.

Table 4: Driving Range and Callaway Elite Performance Centre

	Proposed
No. of storeys	1

No. of bays	25
Max height	5.7m
Floorspace	655sqm (GIA)

- 1.34 The Callaway Elite Performance Centre is proposed to be one of the world's premier facilities for tour player support and golf equipment fitting. It is proposed to be a self-contained element of the driving range facility which will utilise state of the art analysis equipment and fitting methodologies. It is proposed to comprise a workshop, 3 no. double bays, 2 no. meeting rooms, a store and ancillary toilets and changing facilities.
- 1.35 The driving range is proposed to be flood lit to allow the facility to be used during the evenings and winter months. The proposed driving range facilities are proposed to be accessed via an underpass from the existing golf club site to the west of Ash Lane.

Wedding Venue, Accommodation and Facilities (within both TMBC and SDC)

- 1.36 The existing clubhouse and golf club currently host wedding receptions throughout the year. The proposal seeks to re-locate this offering/function into to a suite of existing buildings situated within the central cluster area of the application site. The buildings proposed to collectively form the wedding facilities are:

- South Ash Manor (Grade II* listed building)
- South Ash Barn
- South Ash Manor Farm Cottages (Grade II listed)
- South Ash Stables
- 1 and 2 Ash Road

South Ash Manor (within both TMBC and SDC)

- 1.37 South Ash Manor is a Grade II* listed property that straddles the boundary of TMBC and SDC. The building is presently vacant but was last used as an office until around 2015. The property was recently the subject of application 24/01658/PA, which granted listed building consent for the following:

'Refurbishment of existing building throughout including internal alterations and repairs. Demolition of conservatory to the rear. Insertion of new opening at first floor level to form a new entrance. Installation of new bathrooms on second floor level. Installation of new kitchen at ground floor level. Replacement of cement pointing with lime mortar. Repair to chimney'

- 1.38 This application seeks to change the use of the building from office (Class E) to wedding accommodation and a registry office (Sui Generis). It is proposed to provide 6 bedrooms and associated facilities. The registry office is proposed to be situated within a ground floor room which comprises 16th century wall paintings. No extensions are proposed to the building.

South Ash Barn (solely within SDC)

- 1.39 The barn is presently in use as a workshop and storage facility associated with the operation of the golf courses. The proposal is to reconfigure the internal layout to provide a wedding reception venue with associated facilities.
- 1.40 The proposal includes the removal of a single storey lean to on the northwest facing elevation and the insertion of an additional full height timber door on the southeast facing elevation. An external store is also proposed to be removed from the northeast elevation.

South Ash Manor Farm Cottages (solely within SDC)

- 1.41 South Ash Manor Farm Cottages is a Grade II listed building comprising two separate homes within the building, which are currently used as staff accommodation. The existing accommodation use is proposed to be retained but instead repurposed for wedding guests. No alterations are proposed as part of this application.

South Ash Stables (solely within SDC)

- 1.42 This building was last in use as an office space in association with South Ash Manor. The proposal is to convert the property into additional wedding party/guest accommodation in the form of 4 lodges. The proposal seeks to utilise the existing footprint and does not seek to extend the building. Externally the proposal includes the addition of a timber door, window and skylight on the east facing elevation and the replacement of an existing window with a door on the south facing elevation.

1 and 2 Ash Road (solely within SDC)

- 1.43 These properties are presently vacant but were most recently in residential use. The proposal is for them to be used as wedding party accommodation. No alterations are proposed as part of this application.

Sports Turf Academy (solely within SDC)

- 1.44 A sports turf academy is proposed to be created in the southern parcel of the application site, along with an artificial (3G) multi use sports pitch, in a parcel of land located to the east of Stansted Land and to the immediate north of London Road (A20). This parcel of land is presently occupied by a single storey derelict building previously in use as a care home (Use Class C2) along with grazing land.
- 1.45 The proposal includes the demolition of the existing building at the site and the erection of two single storey buildings connected by a green roof. A summary table (Table 5) is shown below. One of the proposed buildings is to host changing rooms, toilets and kitchen. The second building is proposed to comprise classrooms, event spaces, workshop spaces along with ancillary toilets, storage spaces and a kitchen.

Table 5: Sports Turf Academy

	Proposed
No. of storeys	1

Max height	3.5m
Floorspace	460sqm (GIA)

- 1.46 A range of sporting surfaces are proposed to also be located in this part of the application site to provide external spaces for learning and developing agronomy skills in conjunction with the proposed academy.
- 1.47 An artificial 3G multi use sports pitch is proposed to be created and situated to the northwest of the proposed academy buildings. It is anticipated that both the Sports Turf Academy and artificial pitch would be made available for use by the local community outside of the hours of the primary operational education use.
- 1.48 The proposed sports turf academy and education facility seeks to assist local (and further afield) world-class sporting venues with estate management founded on agronomy (management of soil) through the creation of a pioneering educational institute that will provide full time training and education to turf managers, greenkeepers, horticulturalists and mechanics.
- 1.49 Access to this part of the wider application is proposed to be from the southern edge and directly from London Road (A20), with an existing gated access to the field to the north proposed to be upgraded to facilitate emergency access. An access routes is proposed to the 3G sports pitch taking users/visitors straight through to the field to the north of the southern parcel.

Existing Clubhouse Improvements (solely within SDC)

- 1.50 A general internal re-arrangement is proposed, to make use of underutilised parts of the building, as well as minor elevational changes including an extension to an existing outdoor 1st floor terrace to provide an enhanced restaurant offer.
- 1.51 The lower ground floor is proposed to provide and relocate staff offices along with the creation of a series of golf simulators. The ground floor level is now proposed to host a relocated and larger golf shop, and the upper floor is now proposed to incorporate an external dining space.

Equestrian Facilities (solely within SDC)

- 1.52 An existing equestrian parcel of land is located to the east of the M20, to the north of London Road (A20) and to the west of Stansted Lane. The proposal is to retain this parcel of land for equestrian use, but to replace the existing stable and ancillary structures with 7 new stables and 1 stable/office (approximately 112 sqm GIA) as well as a new 30m x 60m uncovered arena. No new floorspace is proposed.
- 1.53 The proposal is to utilise the existing access arrangements from Stansted Lane, but to improve the existing access and to create a new entrance to the ride (a permissive path that is used an equestrian route following the boundary of almost the entire site) as well as a formalised parking layout that can be used by visitors.

Access and Parking

Access

- 1.54 Other than the proposed southern parcel, hosting the sports turf academy and 3G pitch, and the equestrian parcel of land the proposed development is to utilise the site's existing access point, and main entrance to the golf club, from Stansted Lane. Access to the southern parcel is proposed to be directly from London Road (A20) and the equestrian parcel to be accessible via Stansted Lane.
- 1.55 The main entrance to the site is to be used by both staff and users of the site. Guests staying at the proposed accommodation are to check in at the hotel reception, where they will transfer their luggage to a golf buggy to drive to their accommodation (if not the hotel), while their vehicle is valet parked in the main car park. Guests (for all facilities) are not proposed to have vehicular access around the Site; buggies will be available for guests to move about the site and walking, wheeling and cycling routes are proposed to be provided. Each lodge is proposed to have two dedicated golf buggy parking spaces. No alterations are proposed to the access serving the main entrance to the site.
- 1.56 Access to the eastern parcel, situated to the east of Ash Lane, is proposed to be provided from the main site and via a proposed underpass. This element is discussed in greater detail in the following sub section.
- 1.57 Emergency vehicle access is proposed to be provided to both the eastern and western parcels directly from Ash Lane. Emergency vehicle access is also proposed to be provided to the sports turf academy part of the application site via Stansted Lane, utilising an existing field access.
- 1.58 The development also proposes the use of shuttle buses for staff and visitors, connecting the application site with local railway stations and local communities. Three main routes are proposed to serve Swanley, Dartford, Borough Green and Wrotham stations, stopping off at urban areas on route. Over the course of a typical day, it is proposed that the shuttle buses would operate both a scheduled service and an on-demand service for visitors to serve the overall staff trips.

Underpass

- 1.59 Permission was previously granted under 12/01290/FL for the creation of an underpass from the main site (western parcel) to the eastern parcel to provide access to a relocated driving range and creation of a 9-hole golf course. This permission is extant and could therefore still be implemented. The proposed underpass as part of this application is identical to that previously consented.
- 1.60 The underpass is proposed to be located where an existing Public Right of Way (MR603) enters the main site from the east where there is an existing break in the tree line/woodland. The underpass is proposed to have a headroom of 3.2m to accommodate service vehicles and external visitors (general public) to the proposed

pursuits area. The underpass is also proposed to include a 1.8m wide footway. Additional planting is proposed along the banks of the proposed underpass.

Parking

1.61 The proposed development includes the creation of additional parking provisions at the site to accommodate the proposed developments. The below table (Table 6) summarises the proposed parking to be provided.

Table 6: Proposed Parking Provisions

	Car spaces (excluding disabled)	Disabled spaces	Bicycle spaces	Motorcycle spaces	Coach and Minibus spaces
Hotel and Lodge Accommodation (includes clubhouse/hotel car park)	437	27	44	15	0
Sports Pavillion and Driving Range (inc Callaway Performance Centre)	75	6	70	0	0
Wedding Venue	66	5	0	0	0
Golf Clubhouse	141	2	0	0	0
Sports Turf Academy	24	2	4	0	2
Equestrian Parcel	10	0	0	0	1
Total	753	42	104	15	3

1.62 The proposal also includes the provision of EV charging points and facilities across the site.

Landscaping and Biodiversity

1.63 The proposed development includes extensive landscaping and ecological enhancements, across the application site resulting in a 20.55% biodiversity net gain as well as conserving existing landscape on site including areas of protected ancient woodland. The proposed landscape strategy seeks to create significant new habitat and proposes to incorporate the following key principles:

- Minimises the loss or harm to existing trees, hedgerows or areas of woodland, through the retention of the majority of trees on site and extensive new planting.

The implementation of a robust tree protection measures plan to ensure retained trees are appropriately protected during works and the creation of a 15m ancient woodland buffer zone (as a minimum);

- Provision of dense woodland planting surrounding the ancient woodland buffer zone to enhance the planting and protection of the buffer;
- Provision of substantial new areas of indigenous woodland and hedgerow to reinforce existing woodland areas and to create new landscape structure which will provide a number of roles including providing habitat for wildlife, birds and invertebrates;
- Introduction of substantial swathes of managed wild-flower meadow to areas of the site which are currently dominated by mono-cultural agricultural land or highly maintained amenity grassland;
- Provision of integrated bat boxes across the site;
- Creation of areas of indigenous marginal planting, together with trees and shrubs associated with wetland habitats, in relation to the proposed natural swimming lake, attenuation ponds and SuDs bio-swales.

Drainage

- 1.64 The proposed surface water management strategy seeks to maximise the volume of runoff from the development that can also be re-used within the current recycling framework. Impermeable areas within the western parts of the site are proposed to drain at an attenuated rate to the wider site rainwater recycling system, whilst the eastern and southern areas are proposed to discharge runoff to the ground via infiltration, through the use of borehole soakaways.

Sustainable Drainage Systems (SuDS)

- 1.65 The proposed development includes the following SuDS methods:

Swales

- 1.66 Proposed to be used for conveyance and storage throughout the site, including east and west of Ash Lane. These features are proposed to range in size and blend in scale with the basins, ponds and raingardens as part of the proposed site landscaping for the site. For the steeper parts of the site check dams are proposed to be used to hold water back within the swale features. The swales are proposed to be planted features and designed to be in keeping with the overall ecological management approach for the site.

Green Roofs

- 1.67 Several of the proposed buildings are to shown to incorporate a green roof. Rain landing on the roof will be intercepted by the green roof, which during low return period events will store and filter a large amount of runoff from the roof area within the soil substrate of the proposed planted areas.

Rain Gardens

- 1.68 Rain gardens are proposed to be located across the application site, but most notably adjacent to the proposed buildings. Rain gardens are relatively small

depressions in the ground that can act as infiltration points for roof water and other surface water. Runoff from the buildings is proposed to be directed via downpipes and underground connections to the rain gardens.

Permeable Paving/Surfacing

- 1.69 Runoff from all roads and areas of hardstanding in the western parts of the site, in addition to overflow from green roofs and rain gardens are proposed to be directed via underground pipes into a layer of open graded subbase material, located beneath permeable paving/surfacing.

Drainage Basins

- 1.70 Drainage basins are proposed to the rear of the proposed hotel and adjacent to the lodges within the western parcel of the application site. The basins are proposed to be additional storage features on site, to temporarily store and attenuate the rate of flow of surface water through the site. The proposal is to integrate these features through lined planting/landscaping
- 1.71 The basin to be located adjacent to the hotel is proposed to be solely used to drain the roof area of the hotel. Half of the hotel roof is proposed to drain via a series of swales located to the front of the hotel, connected to the basin, whilst the remaining part of the roof will be connected directly to the basin via underground pipes.
- 1.72 The smaller basins proposed adjacent to the lodges form part of a cascading SuDS corridor, aimed at managing the runoff from this part of the site, before discharging to a piped network connected to the existing water re-use system on site. The group basins offer additional storage volume, slowing down the rate of surface water flow to subsequent SuDS devices.

Geocellular Storage Tank

- 1.73 A storage tank is proposed to be located beneath the proposed car park located to the south of the existing clubhouse. It is proposed that runoff from the proposed access routes and car parking in the western parcel will be directed into this tank. The storage tank offers an additional volume of storage for stormwater, allowing surface water to be discharged offsite at an attenuated rate via a vortex flow control device.

Deep Borehole Soakaways

- 1.74 The eastern and southern parts of the application site are proposed to utilise deep borehole soakaways to manage surface water runoff. Surface water runoff in these parts of the site are proposed to be conveyed to the borehole soakaways via rain gardens, swales and below ground piped connections. In total, 39 borehole soakaways are proposed for the site (13 for the southern catchment and 26 for the eastern catchment). Geocellular storage tanks are proposed to be located above each borehole soakaway for temporary surface water storage, before draining below to each soakaway and allowing infiltration into the underlying geology. The proposed

boreholes are located a minimum 15 metres from any buildings and at least 10 metres from each other.

Foul Water

- 1.75 The application site is not located within close proximity of a public foul sewer and therefore the application proposes the use of package treatment systems.

Energy and Sustainability

- 1.76 The application seeks to deliver a net zero carbon development (or as close as possible), covering both embodied and operational CO₂ emissions. The proposed development seeks to serve as a benchmark for sustainable development, drawing on innovative materials and technologies to produce a low carbon design, both operationally and in the embodied sense.
- 1.77 A strategy has been submitted in support of the application which sets out the following measures and commitments:
- An energy efficient design of buildings which promotes low energy usage, with a high standard of insulation for all fabric elements (walls, floor, roofs, glazing), minimal air leakage, and limited cold bridging.
 - A novel approach to heating and cooling design which uses ground source heat pumps to leverage heat from the ground. Highly efficient air source heat pumps are proposed in some instances where heat extraction from the ground is not possible. No gas-powered plant will be used.
 - All new buildings will incorporate highly energy-efficient ventilation technologies offering a high degree of heat recovery. These spaces will also be provided with other low carbon services such as LED lighting.
 - An extensive installation of photovoltaic (PV) generating capacity across the Site. In total, this could exceed 410 kW of renewable power which could offset more than 76 tonnes of CO₂ emissions annually. A significant quantity of renewable power generation on site will also assist in reducing the developments burden on the local electricity supply and will reduce the energy costs for building occupants.
 - Carefully targeted refurbishments to the grade II and grade II* listed buildings such as improved glazing and lighting. These will reduce energy demands whilst preserving the historic significance of the buildings.
 - A considered approach to the specification and resourcing of materials with high embodied carbon emissions will also be adopted. This will focus particularly on exploring alternative to traditional concrete mixes and specifying steel with a high recycled content or steel made with renewables, as well as reducing wastage as far as possible.
- 1.78 In addition to the above the strategy sets out the following wider sustainability measures include:
- A commitment to a high standard of sustainable construction and design through addressing multiple environmental considerations such as water use, waste

strategy, and biodiversity. The Club is seeking GEO certification, which is the most widely regarded sustainability distinction in golf. In addition, the Club is also pursuing Green Mark accreditation which is a comprehensive framework for the environmental impact of buildings.

- A high standard of water efficiency alongside water recycling and sustainable drainage measures, which will ensure that the use of mains water for irrigation is minimised.
- Extensive landscaping and ecological enhancements, which will result in a Biodiversity Net Gain (BNG) of over 20%.

Employment

- 1.79 The proposed development is expected to support approximately 430 FTE direct gross jobs on site. Taking into consideration the existing jobs, this will be an increase of 340 FTE direct jobs on site. In addition, it is estimated that construction would take approximately 3.5 years and could support up to 480 FTE jobs on average within the construction sector over this duration.
- 1.80 The proposed seeks to provide a range of local employment opportunities across the skills spectrum from entry level to managerial positions. Jobs supported by the accommodation, leisure, and food and beverage facilities and wedding venue will likely support a higher proportion of lower skilled and flexible roles (such as part time and shift work). Whereas mid and higher skilled roles created are likely to be related to the managing of the range of facilities proposed along with coordinating wedding and other events. The proposed Sports Turf Academy will also provide training in the management of sports grounds which will help to support further jobs either directly or in directly.

2. Reason for reporting to Committee:

- 2.1 Due to the strategic nature of the development.

3. The Site:

- 3.1 The application site comprises the London Golf Club, situated to the north of Stansted Lane, and agricultural parcels of land located to the east of Ash Lane. The ownership of the London Golf Club (applicant) extends to approximately 270 hectares in total however the red line of the proposed application site only includes 52ha of the wider holding.
- 3.2 The site is located across the administrative area of both TMBC and SDC where the more eastern parts of the application site fall within TMBC. The parts of the application site which lie within TMBC fall within the Stansted Parish of the borough. The site is located outside of a defined settlement boundary and within the Green Belt.
- 3.3 The north of the application site is bound by Warren Park, a gypsy traveller site, along with areas of woodland and agricultural land. The east of the site is adjacent to land in agricultural use. To the south lies London Road (A20) and further agricultural

land and to the west of the wider golf club site is bound by the M20. The site is subject to significant elevation changes, with land running from the eastern boundary down towards the southwest.

- 3.4 As set out within Paragraph 1.1 in the above 'Description of Proposal' section of this report; for the purpose of this application the site has been subdivided into the following titled areas/locations: Central Cluster, Eastern Parcel, Western Parcel, Southern Parcel and Equestrian Parcel.

Central Cluster (within both TMBC and SDC)

- 3.5 This area is located to the west of Ash Lane and comprises the existing clubhouse and a number of other ancillary buildings generally associated with the maintenance and upkeep of the golf course along with the Grade II* listed South Ash Manor. This area is made up of the following:
- Golf Clubhouse: Currently used as the clubhouse for the Golf Club and also used for events and weddings;
 - South Ash Manor (Grade II* listed): Currently vacant but most recently in office use (straddles the boundary of the two local planning authorities);
 - The Barn: Currently in use as storage and a workshop for equipment which is associated with the operation of the golf course;
 - South Ash Manor Farm Cottages (Grade II listed): Currently used as staff accommodation;
 - 1 and 2 South Ash Road (Kirby Cottage): Currently vacant but was most recently in residential use;
 - South Ash Stables: Currently vacant but was most recently in office use.

- 3.6 This part of the application falls entirely within SDC other than the more southern and eastern parts of South Ash Manor and the land to the immediate south and east of the is listed property.

Eastern Parcel (Solely within TMBC)

- 3.7 This part of the application site relates to land to the east of Ash Lane. The parcel presently comprises two agricultural fields separated by a belt of tree planting. The land in the eastern parcel has a natural dip in its topography, the southern end of the eastern parcel has changing site levels which drops away from east to west. Each of the two fields are presently accessible via field gates from Ash Lane. This parcel of land is subject to an extant permission for the re-location of the driving range along with the creation of a new 9-hole golf course and the creation of an underpass beneath Ash Lane.

Western Parcel (within both TMBC and SDC)

- 3.8 This parcel is located to the immediate west of Ash Lane and primarily comprises the existing driving range along with some areas of hardstanding and shrubland. The most southern section of this parcel comprises a woodland clearing bounded by

ancient woodland. Access to the western parcel is obtained from the main access to the golf club which runs through the site from Stansted Lane.

- 3.9 The majority of this parcel lies within TMBC other than the most southern part comprising the woodland clearing, which is situated within SDC. This parcel of land presently has an extant permission for a hotel, spa and parking, which has been lawfully implemented but not yet built out.

Southern Parcel (Solely within SDC)

- 3.10 This parcel is located to the north of the A20 and to the east of Stansted Lane. It comprises an area of hardstanding and two derelict single storey buildings that were previously in use as a care home. The remainder of the parcel comprises grazing land. Access to this parcel is obtained directly from the A20.

Equestrian Parcel (Solely within SDC)

- 3.11 This parcel is situated to the southwest of the main entrance to the golf club and to the east of the M20. The parcel comprises a small number of stable and ancillary structures with the remainder of the site comprising paddocks and grazing land. Access to this site is obtained via a gate along Stansted Lane.

Planning Constraints

- 3.12 The following planning constraints relate to the application site and its surroundings:

- Agricultural Land Classification Grade 3
- Ancient Woodland (adjacent to the proposed 'Woodland Lodges' in SDC and approximately 285m to the south of the 'Eastern Parcel' of the application site)
- Area of Archaeological Potential
- Grade II* Listed Building – South Ash Manor
- Grade II Listed Buildings:
 - o South Ash Manor Farm Cottages
 - o Rumney Farm House (located approximately 130m to the north of the application site along South Ash Road)
- Ground Water Vulnerability Zone
- Historic Farmsteads:
 - o South Ash Manor
 - o Rumney Farm (located approximately 130m to the north of the application site along South Ash Road)
- Metropolitan Green Belt
- North Downs National Landscape (approximately 1.3km to the south of the 'Eastern Parcel' of the application site)
- Public Rights of Way
 - o MR217 (Public Bridleway) – adjacent to and running along the east boundary of the application site
 - o MR200 (Byway open to all traffic) – adjacent to and running along the east boundary of the application site. A continuation of MR217

- MR221A (Restricted Byway) – running along a section of Ash Lane to South Ash Road
- MR604 (Public Bridleway) – running across the application site from the east boundary to Ash Lane
- MR603 (Public Footpath) – running into the application site from Ash Lane in a west direction
- SD257 (Public Footpath) – running from Ash Lane into the application site
- MR234 (Public Footpath) – running across the golf club/courses towards the M20
- SD253 (Public Footpath) – connecting London Road to Stansted Lane
- SD258 (Public Footpath) – connecting London Road to Stansted Lane
- Rural Lane – Ash Lane
- Stansted Conservation Area (approximately 820m to the east of the application site)
- Tree Preservation Orders – located to the east of Ash Lane

4. Planning History (relevant):

4.1 The below table provides a history of the relevant applications submitted to TMBC.

Table 7: TMBC Planning History (relevant)

Application No.	Proposal	Decision	Date
24/01658/PA (South Ash Manor)	Listed Building Application: Refurbishment of existing building throughout including internal alterations and repairs. Demolition of conservatory to the rear. Insertion of new opening at first floor level to form a new entrance. Installation of new bathrooms on second floor level. Installation of new kitchen at ground floor level. Replacement of cement pointing with lime mortar. Repair to chimney	Approved	03/03/25
24/00948/PA	Request for an EIA Scoping Opinion under Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as Amended): Proposed redevelopment of land for new hotel and sports academy, visitors lodge, pavilion, golf driving range and leisure facilities.	EIA Opinion Scoping Application	01/08/24
14/01349/LDE (Eastern and Western Parcel)	Lawful Development Certificate Existing: Section of access road leading to hotel car park, part construction of car park and service road to hotel	Certifies (Approved)	06/06/14
13/03482/FL (Eastern Parcel)	Application to vary condition 4 (hard surfacing materials), 10 (highways	Approved	06/02/14

	authority consents) and 11 (construction underpass details) of planning permission TM/12/01290/FL (Diverted access road to permitted hotel on land to the west of South Ash Road. The relocation of the existing driving range on land to the east of South Ash Road. A European Tour Performance Institute(ETPI) driving range building. A 9 hole golf course created utilising the cut from the hotel development. Chipping area and putting green. An underpass under South Ash Road. Areas of hard standing including car parking and access road. Diverted public rights of way. Associated reservoir and landscaping)		
13/03450/NMA (Eastern Parcel)	Non-Material Amendment to planning permission TM/12/01290/FL (Diverted access road to permitted hotel on land to the west of South Ash Road. The relocation of the existing driving range on land to the east of South Ash Road. A European Tour Performance Institute (ETPI) driving range building. A 9 hole golf course created utilising the cut from the hotel development. Chipping area and putting green. An underpass under South Ash Road. Areas of hard standing including car parking and access road. Diverted public rights of way. Associated reservoir and landscaping) alteration to access road to west of Ash Lane	Approved	16/01/14
13/03449/NMA (Western Parcel)	Non-Material Amendment to planning permission TM/12/00497/FL (Variation of conditions 2 and 10 of planning approval TM/09/03149/FL (130 bed hotel plus spa, 20 staff bedrooms, ancillary restaurant and conference facilities, ballroom and health spa and associated parking and landscaping) to alter the timing of submission of details of external materials for the hotel building(s) and the final certificate for 'very good' BREEAM rating): Alteration to access road to hotel	Approved	16/01/14

Area 2 - Planning Committee

13/00665/TPOC (Eastern and Western Parcels)	Felling of specific trees within Woodland W1, as defined fully in supporting letter, to allow for the construction of an ETPI facility and associated underpass. Replanting with approximately 2000 trees in addition to shrub planting as part of wider ETPI scheme	Approved	15/03/13
12/01290/FL (Eastern Parcel)	Diverted access road to permitted hotel on land to the west of South Ash Road. The relocation of the existing driving range on land to the east of South Ash Road. A European Tour Performance Institute(ETPI) driving range building. A 9 hole golf course created utilising the cut from the hotel development. Chipping area and putting green. An underpass under South Ash Road. Areas of hard standing including car parking and access road. Diverted public rights of way. Associated reservoir and landscaping	Approved	20/03/13
12/00497/FL (Western Parcel)	Variation of conditions 2 and 10 of planning approval TM/09/03149/FL (130 bed hotel plus spa, 20 staff bedrooms, ancillary restaurant and conference facilities, ballroom and health spa and associated parking and landscaping) to alter the timing of submission of details of external materials for the hotel building(s) and the final certificate for 'very good' BREEAM rating	Approved	03/06/13
09/03149/FL (Western Parcel)	130 bed hotel plus spa, 20 staff bedrooms, ancillary restaurant and conference facilities, ballroom and health spa and associated parking and landscaping	Approved	09/06/11
02/01509/FL (Exisitng Driving Range)	Construction of single storey covered driving bays and practice area	Grant With Conditions (Approved)	11/11/02
00/00634/LB (South Ash Manor)	Listed Building Application: partial demolition of chimney no.3 to a safe level and rebuild as existing using new and salvaged bricks	Approved	11/12/00

98/00797/LB (South Ash Manor)	Listed Building Application: Refurbishment of Manor House and conversion of barn to offices.	Grant With Conditions (Approved)	29/12/98
98/00796/FL (South Ash Manor)	Change of use to office facilities for The Manor House with conversion and change of use to offices for The Barn	Grant With Conditions (Approved)	29/12/98
90/10571/OUT (Golf Clubhouse)	Outline Application for two-storey golf clubhouse of 2725 sq m floor area with car parking (as ancillary development to recently approved golf courses) including demolition of redundant agricultural buildings and landscaping cleared sites as part of golf course development	Grant With Conditions (Approved)	07/12/90
90/10176/FUL (Golf Course)	Use of land as two 18 hole golf courses, practice ground, access road, water features, bridleways and landscaping	Grant With Conditions (Approved)	25/10/90

4.2 Application 09/03149/FL previously granted consent for a 130-bedroom hotel in the eastern parcel of the application site. The now proposed hotel is to be sited in the same area of the wider application site. Permission has also previously been granted, under 12/01290/FL, for the creation of an underpass to the wester parcel of the application along with the creation of a driving range and 9-hole golf course. The now proposed driving range is in the same location as that previously approved.

4.3 These approvals were followed by 14/01349/LDE, which sought consent for a lawful development certificate. The application sought certification that ground and engineering works undertaken, providing sections of private access and services roads and a car parking area, relating to two extant planning permissions (TM/09/03149/FL (130 bed hotel development) which has been varied under reference TM/12/00497/FL; and TM/12/01290/FL (ETPI driving range / 9-hole golf course) which has been varied under reference TM/13/03482/FL). This application was certified/approved.

4.4 The previous permissions relating to the hotel, driving range, underpass along with the 9-hole golf course are therefore extant and could still be fully implemented.

4.5 The below table (Table 8) provides the history of the relevant applications submitted to SDC.

Table 8: SDC Planning History (relevant)

Application No.	Proposal	Decision	Date
24/02712/FUL	Cross boundary application: Proposals within Tonbridge and Malling Borough Council area: Erection of a hotel with spa and conference facilities, and visitor accommodation lodges,	Pending Consideration	-

	<p>associated parking and landscaping located to the west of Ash Lane. An underpass under Ash Lane connecting the main golf club site with the eastern parcel. A sports pavilion (comprising a restaurant, gym and studios), racket courts and a swimming lake; visitor accommodation lodges and a new relocated driving range and Elite Performance Centre located to the east of Ash Lane along with associated parking and landscaping. Change of use of Grade II* listed South Ash Manor and adjacent stables block from office use to visitor accommodation. Refurbishment of Grade II* listed South Ash Manor including internal and external alterations and demolition of conservatory.</p> <p>Proposals within the Sevenoaks District Council area: Erection of visitor accommodation lodges and landscaping located to the west of Ash Lane. Demolition of the existing building within the southern parcel and redevelopment of land into a sports turf academy with associated surfaces and an artificial pitch. New equestrian facilities including an arena and replacement stables. Change of use of Grade II* listed South Ash Manor and adjacent stables block from office use to visitor accommodation. Refurbishment of Grade II* listed South Ash Manor including internal and external alterations and demolition of conservatory.</p>		
<p>24/02733/LBCALT (South Ash Manor)</p>	<p>Refurbishment of existing building throughout including internal alterations and repairs. Demolition of conservatory to the rear. Insertion of new opening at first floor level to form a new entrance. Installation of new bathrooms on second floor level. Installation of new kitchen at</p>	<p>Pending Consideration</p>	<p>-</p>

Area 2 - Planning Committee

	ground floor level. Replacement of cement pointing with lime mortar. Repair to chimney		
14/03123/FUL (North of Central Cluster)	The erection of a building for tennis club including locker rooms, reception, office, kitchen and café associated to Golf Club and spectators seating, four outdoor tennis courts and associated landscaping.	Withdrawn	05/08/15
13/01731/FUL (Southern Parcel)	Change of use from C2 - residential institution to C3 - general residential, for two properties.	Approved	25/10/13
08/01519/FUL (Barn)	External alterations to barn to provide 2 sets of glass doors	Approved	28/07/08
08/00923/FUL (Kirby Cottages)	Demolition of two existing semi-detached dwellings and erection of 1 replacement dwelling	Approved	10/06/08
06/01217/LDCPR (Southern Parcel)	Repositioning of access gates to recently acquired field. Closing off of existing access. Current use will not be altered but potential for event overflow car park, not exceeding 28 days pa.	Approved	02/06/06
05/02415/FUL (Golf Course)	Removal of original constructed pond protecting 9 th Green and replacement with a moulding and bunker complex.	Approved	21/11/05
03/00719/FUL (Southern Parcel)	Demolition of existing buildings and erection of two four-bed registered care homes for people with learning difficulties and additional needs.	Approved	21/05/03
00/02224/FUL (Southern Parcel)	Conversion of existing dwelling to mixed use, guest house and dwelling. Laying of associated car parking area and widening of entrance.	Approved	02/02/01
98/01005/HIST and 98/01098 (South Ash Manor)	Proposed change of use to office facilities for the Manor House with conversion and change of use to offices for the barn adjacent	Approved	05/01/99
93/01073/HIST (South Ash Manor Farm Cottages)	Demolish small lean-to, to no.4 of poor-quality brickwork with corrugated roof and carefully restore both cottages	Approved	21/09/93
93/00037/HIST (South Ash Manor)	Listed Building Consent - Conversion of outbuilding repairs and alterations in connection with use as administrative offices for golf club	Approved	15/03/93

93/00036/HIST (South Ash Manor)	Conversion of outbuilding repairs and alterations in connection with use as administrative offices for golfclub	Approved	15/03/93
92/01768/HIST (Golf Course)	Erection of entrance and flanking walls	Approved	10/03/93
92/00902/HIST (Equestrian Parcel)	Detached dwelling with septic tank	Refused (Appeal Dismissed)	05/08/92
92/00412/HIST (Barn)	Conversion of the barn - repairs and alterations in connection with use as caddy services facility	Approved	30/04/92
91/01098/HIST (Golf Course)	Erection of two single storey halfway houses	Refused (Appeal Dismissed)	25/11/91
91/01097/HIST (Golf Course)	Erection of three single storey starter huts	Refused	18/07/91
91/00950/HIST (Barn)	Erection of single storey greenkeepers buildings with related yard and car parking, to serve golf courses previously approved	Approved	25/11/91
91/00949/HIST (Golf Clubhouse)	Erection of two storey golf clubhouse with associated car parking and access road to serve golf courses previously approved.	Approved	25/11/91
90/01141/HIST	Original Golf Club Planning Permission: Use of land as two 18 hole golf courses, practice ground, access road, water features, bridleways and landscaping (revised application)	Approved	31/08/90

5. Consultee Responses

Stansted Parish Council

- 5.1 (07/03/25) We have some concerns that the application fails to provide meaningful benefits to the local community and is not aligned with greenbelt policies, but we feel these can be offset via an offsite community benefit contribution.
- 5.2 The proposal claims to deliver 'significant community benefits,' yet these are insufficient to meet the existing pressing needs of the local community.
- The development's focus is on luxury facilities, such as a 240-room hotel, exclusive lodges, a sports pavilion, and a high-performance golf centre, catering predominantly to affluent tourists and elite athletes rather than the local population.
 - While the Sports Turf Academy is proposed as an educational resource, its highly specialised nature limits its relevance and accessibility to most local residents.

- No provision has been made for affordable use of recreational facilities or services that meet the community's everyday needs, such as affordable gym memberships for the community to use, a shop or meaningful public transport improvements.

5.3 The construction and operation of such a large-scale project threaten nearby ancient woodlands and Kent Chalk Downland.

- The development site land is Kent Chalk Grassland – one of the most biodiverse habitats in England, often called the "rainforests of the UK" due to its ecological richness. Chalk grassland can support over 40 species of wildflowers per square meter, including rare plants like man orchids and horseshoe vetch, which provide essential food for specialist insects such as the Adonis blue and chalkhill blue butterflies. The thin, nutrient-poor soils prevent dominant plant species from taking over, allowing delicate wildflowers to thrive, while the open, sunny conditions create an ideal environment for pollinators like bees, butterflies, and moths. Shaped by centuries of traditional sheep grazing, these landscapes also hold archaeological significance, with ancient tracks often found within them. Additionally, chalk grasslands play a vital role in storing carbon, helping to combat climate change, and act as natural water filters by purifying water as it passes through the chalk aquifers beneath. These habitats are often retained by sheep grazing; taking this land out of grazing use would be a huge loss to this endangered landscape.
- Likewise, the impact of the development's lighting on our dark skies has not been adequately demonstrated. Our Parish doesn't have any street lighting, and external lighting to houses is extremely limited. If the proposal does go ahead, then more mitigation measures need to be put in place to allow for the development to integrate with the lighting character of our Parish. Similarly, we are also concerned about the impact of lighting on the local birdlife population.

5.4 This land is extremely high-quality metropolitan greenbelt. Therefore, it is particularly important that the scheme's benefits outweigh the harm to this most precious landscape.

5.5 The Metropolitan Green Belt aims to strictly control development, to preserve openness and to prevent urban sprawl.

- The proposed scale and scope of this development, including substantial new buildings, suburban-style lodges, and associated infrastructure, fundamentally undermine the principles of Green Belt policy.
- The development creates unnecessary urban sprawl within high-quality greenbelt land. The greenbelt should be safeguarding the countryside from encroachment. We feel this could have been done by creating a denser development site within a tighter boundary, removing the need for the suburban-type development to the east of Ash Road.

- Promoting sustainable transport methods is also paramount in determining the appropriateness of green belt land for development. This hasn't been adequately demonstrated, and the proposed minibus for staff is insufficient to be considered sustainable.
- The openness of this part of the greenbelt will be harmed by the development, and the application doesn't properly demonstrate how severe this will be in long views.

5.6 In order for the application to meet the 'very special circumstances', improved community benefits would go some way to helping to justify the irreversible harm this green field land.

5.7 The development will put pressure on local roads and infrastructure without corresponding improvements for the local community.

- The traffic assessment lacked any assessment of the impact on the lanes in Stansted Parish, particularly Hatham Green Lane and the onward route to the A227. 'Ash Lane' (actually South Ash Road) is wrongly described in the traffic assessment as a two-way, and no meaningful baseline studies were undertaken. It does not define the road width or existing problems with unadopted passing places. All traffic is planned to route onto the A20. As locals, we understand the impacts that any local road closures or event days at Brands Hatch have on our village. Any sat nav rerouting causes an unsafe walking/horse riding and cycling environment, and the verges get churned up with passing places created where there weren't any. Not only does this create a less liveable environment for Parishioners, but it also costs the Parish Council time and money to repair the verges and fill in potholes on the sides of roads.
- Increased pressure on local footpaths and footpath maintenance. Our area is a favourite with walkers and it would be only natural for guests to want to walk in the area. The significant number of guests proposed would increase wear and tear on paths, styles etc.

5.8 Our local lanes suffer when any additional pressures are put on them. Most of our Parish has single-track lanes, and additional vehicles meeting cause new unofficial passing places to be carved out of the verges. These then produce potholes from overuse. This development is going to cause a huge increase in the additional verge maintenance that is required.

5.9 During the 3.5 years of construction, inevitable road closures on the wider road network will likely result in traffic being rerouted through our Parish.

- The lanes aren't suitable for heavy traffic, particularly large construction vehicles.
- If there are odd times when construction vehicles reroute or get lost and end up driving through the village, the damage to local lanes, particularly to signage, verges, hedges, and overhead branches, will be significant, with the Parish Council being left to foot the bill.

- 5.10 Similarly to our last point, the costs involved with repairs from any additional road pressures will be huge for the Parish Council.
- 5.11 As the Parish most affected by this development, we are supportive of the application IF the harm to the greenbelt is sufficiently offset by improved benefits to the local community via an Offsite Community Benefit Contribution.
- 5.12 One of the principal objectives of the proposal is to secure community benefits and increase tourism in the local area with the economic and community benefits positioned as major elements of the Applicant's Very Special Circumstances argument. Whilst the development is proposing to provide onsite facilities, an Offsite Community Benefit Contribution would assist the Parish in the delivery of several key projects which will support the existing community, enhance the experience of visitors and result in additional community benefits.
- 5.13 The Parish has identified key initiatives which could be supported by an Offsite Community Benefit Contribution, the two principal projects are a new Village Hall in Stansted and a MUGA in the recreation field next to the school. Planning Applications for both of these are currently in with TMBC.
- 5.14 In addition, there a number of smaller initiatives which will also seek to enhance the Parish for visitors from the development and existing residents. Some of these (like verge repairs) will be needed directly to offset the additional pressures on the village.
- 5.15 As you are aware, the s106 contribution must meet the relevant planning tests, which should be 1. Necessary to make the development acceptable in planning terms; 2. Directly related to the development and 3. Fairly and reasonably related in scale and kind to the development.
- 5.16 An Offsite Community Benefit Contribution could be used for a range of community-focused projects that would meet the relevant planning tests.
- 5.17 An Off-site Community Benefit Contribution is necessary to secure benefits to the local community, as the Parish most affected by the proposed development this request is fair and reasonably related in scale and kind to the development.
- 5.18 How the Off-site Community Benefit Contribution could be spent: Stansted Parish is a popular walking destination due to its natural beauty as a chalk-down land and its historic setting and conservation area. There are many popular circulars and longer-through routes that typically stop at The Black Horse or go to The Green Man on Hodsoll Street for refreshments. Sadly, the Black Horse closed its doors in October 2024, and the Green Man burnt down a few years ago. This has left the village without any community spaces to purchase refreshments outside of the weekly coffee morning at the Church and a monthly community café in Fairseat. The nearest other options are the Twig and Spoon Café at Woodlands Garden Centre (30 min

walk) however, this is very popular and booked weeks in advance, the Hilltop (30 min walk) which is more formal dining, the Portobello Inn (45 min walk), which involves walking on the A20 to get to West Kingsdown, the White Swan, Ash (45 min walk).

- 5.19 There is an unmet need within the Parish for a location selling refreshments to walkers and other village visitors and tourists. The number of walkers coming to the centre of Stansted is expected to rise significantly due to the number of visitors to the Golf Club. This is a country hotel with an external operator; the golf club will be at the same site but run separately. Therefore, we believe that country hotel visitors will likely go on a country walk whilst visiting for the weekend or longer. They will use the attractive footpaths that lead into the village to walk their dogs, bring their children to the playground and look around the area. The cafes within the community are already operating at full capacity, and the proposed development will increase the demand further.
- 5.20 The majority of the proposed development falls into the Parish of Stansted. The proposed café would be a 20 min cross-country walk from the development and is directly related to it as visitors to the hotel are most likely to come to the café over other establishments in the area.
- 5.21 The Village Hall has proposed opening a café within its space to accommodate this need and the future needs of those visiting the Golf Club. It is required to elevate pressures for this facility within the village. However, these facilities are out of date and not fit for purpose. The Parish Council has submitted a planning application to TMBC.
- 5.22 Stansted Café and Village Hall - Stansted Village Hall committee has just submitted an application to TMBC to erect a new larger village hall and café. The revitalised village hall would host farmers' markets at weekends, as well as leasing a café similar to Average Doughs in Leybourne Chase to create a vibrant destination to attract walkers and visitors from the surrounding areas and Golf Club. Stansted is the nearest village within a country walk distance from the Golf Club. It is an attractive village with a playground, pub and church. Any users of the hotel who want to go for a walk (which is often the case when you are away for a country weekend) are likely to walk to the Parish rather than take an alternate route in another direction due to the constraints of the motorway and main road network. The café is very likely to be used by tourists visiting the golf club and we, therefore, consider it to be a reasonable request a contribution towards it.
- 5.23 Multi-Use Games Area (MUGA) to provide accessible sports facilities within Stansted Recreation Ground - Visitors to the Golf Club are likely to walk into the village and visit the recreation ground with their children. The village is in need of an outdoor games area, and this application is guaranteeing no access to the sporting facilities at the golf club; it is therefore considered essential by the Parish that these are also delivered offsite within the heart of the village.

- 5.24 The Parish is anticipating increased traffic from the golf club, particularly during the 3.5-year construction phase and any time there are events at Brands Hatch or other road closures. The village needs calming measures to reduce speeds into the village by users of the Golf Club and to discourage GPS systems to reroute people through the village. The village is planning to install four solar-powered speed signs to highlight car speeds as they drive through the village and planters to define better and draw attention to the white gateway-style entrances to the village, hoping to encourage people to slow down.
- 5.25 The Parish is facing additional maintenance costs due to the increased wear and tear on the village from construction workers, tourists and staff travelling, being rerouted through and visiting the Parish. The Parish owns a maintenance shed, which needs replacement. The existing shed needs removing, the asbestos needs dealing with, and a new access gate, gravel and installation.
- 5.26 The Parish is constantly battling new passing places being created when people drive up the soft verges. These are already a big issue without the development site; we think these will become even more of a problem with increased traffic. We are also very concerned that if even one construction vehicle accidentally reroutes, it could cause thousands of pounds of damage to our single-track lanes. We have attempted to get KCC to adopt some passing places, but they have refused. The Parish Council has no option other than to deal with them ourselves, making them safe, workable and attractive.
- 5.27 We undertook a passing place survey (Appendix 6.1), identifying 42 passing places with verge erosion and associated potholes. These potholes total 344 sqm and need repairing. This development will also increase traffic and, therefore, issues with passing places, resulting in ongoing costs to the village.
- 5.28 The Parish is trying to improve facilities for those on foot to encourage social interaction and dwelling opportunities. This will be for locals as well as visitors from the golf club. These include the installation of seven benches, 7 set of litter and dog waste bins and a bicycle shelter to encourage cyclists to the village.
- 5.29 (05/12/24) This proposal raises several considerations that may significantly impact our community, and we are carefully reviewing the documentation to fully understand its implications.
- 5.30 Given the scope of the development and its potential effects on local infrastructure, community resources, and environmental considerations, we are in the process of seeking legal advice to ensure we can make an informed response. This application touches on key areas of concern such as Green Belt policies, community benefits, and local infrastructure capacity, which require detailed examination.
- 5.31 We respectfully request that no determination is made on the application until we have had the opportunity to follow up with a comprehensive response. However,

should the Council proceed to determine the application before we are able to provide further comments, we ask that this letter be classified as an objection to the application.

5.32 Our concerns include:

1. Inadequate Community Benefits – The proposed development prioritizes luxury facilities catering primarily to external, affluent audiences, with insufficient benefits or accessibility for the local community.
2. Conflict with Green Belt Policies – The scale and scope of the development are not supported by sufficient evidence of “very special circumstances” to justify harm to the protected landscape.
3. Pressure on Local Infrastructure – The proposed development is likely to place additional strain on roads, public services, and community resources, with limited mitigation measures identified.
4. Environmental and Heritage Impacts—The application does not adequately address potential risks to ancient woodlands, local biodiversity, and heritage assets.

5.33 These points represent significant areas of concern that merit further discussion and clarification before any decision is made. Additionally, we would welcome extra time to engage with the developers to understand the project's impacts more fully.

Sevenoaks District Council

5.34 (04/12/24) Sevenoaks District Council reserves its position on the development while the parts of the development within our own administrative area are assessed. It will be for Tonbridge and Malling Borough, as local planning authority, to assess the proposed development within its authority area in the context of the National Planning Policy Framework and the development plan in place for the borough. This will include policies for the protection of the Green Belt and a consideration of whether any harm caused by the development is clearly outweighed by a case of very special circumstances, including social, economic and environmental benefits; conserving and enhancing the heritage assets; the protection of the landscape; the delivery of biodiversity mitigations and enhancements; and securing safe and suitable access to the development. There will be a number of associated environmental impacts, as addressed in the accompanying Environmental Statement, and it will be critical for Tonbridge and Malling to consider whether any environmental impacts can be suitably mitigated and that such mitigation is appropriately secured.

Natural England – No objection

5.35 (27/11/24) Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

5.36 Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

- Impact Risk Zones: Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone, then Natural England will provide an auto-response email.
- Standing Advice: Natural England has published Standing Advice.

5.37 Non-detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision-making process.

Sport England – No objection

5.38 (03/12/24) The site is not considered to form part of or constitute a playing field as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore, Sport England has considered this a non-statutory consultation.

5.39 The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications.

5.40 Sport England assesses this type of application considering the National Planning Policy Framework (NPPF) and against its own 12 planning-for-sport principles. The three overarching principles are to: recognise and give significant weight to the benefits of sport and physical activity; undertake, maintain and apply robust and up-to-date assessments of need and strategies for sport and physical activity provision, and base policies, decisions and guidance upon them; and plan, design and maintain buildings, developments, facilities, land and environments that enable people to lead active lifestyles. These three overarching principles form the framework for a further nine principles under the broad categories of Protect, Enhance, and Provide.

5.41 The proposal is split between two authorities, namely Sevenoaks and Tonbridge and Malling. Those elements within Tonbridge and Malling that relate to sport are the creation of a sports pavilion, tennis courts, golf driving range, and an outdoor swimming area.

5.42 Comments made on those elements within Sevenoaks that relate to the creation of a sports turf academy with an artificial pitch and upgrading of the existing equestrian

facilities have been sent separately to that authority and are not addressed in this response.

- 5.43 England Golf, England Swimming and the Lawn Tennis Association have been consulted on the proposal. England Swimming and the Lawn Tennis Association have not responded at this point.
- 5.44 England Golf support the proposal as there is no loss of provision and is an enhancement of golf facilities. On the portal we can't find any reference to ball strike assessment related to the driving range but assume that has all been considered as part of the design. In terms of existing users, the site has more than double the national average of members.
- 5.45 The proposal includes an area of the site to be developed to three tennis courts, four padel courts with an associated pavilion with changing rooms. The emerging Tonbridge and Malling Playing Pitch Strategy indicates that, at present, for tennis, when aggregated for the whole borough, there is a small surplus of provision, equivalent to one non-floodlit court. However, based on current participation trends and a range of population growth scenarios by 2041 there will be a need that is equivalent to six extra courts for the lower population projection and 11 extra courts under the higher population projection. This proposal would help meet the identified tennis shortfall.
- 5.46 It is advised that the applicant should ensure that the proposed tennis courts adhere to the LTA's design guidance for such facilities.

Conclusion

- 5.47 In light of the above considerations, Sport England raises no objection to the application.

Active Travel England – No objection

- 5.48 (21/11/24) Refer to standing advice (<https://www.gov.uk/government/publications/active-travel-englandsustainable-development-advice-notes>)

Environment Agency – No objection

- 5.49 (04/12/24) No objection to the proposed development subject to planning conditions being attached to any planning permission granted.

Surface Drainage

- 5.50 We have reviewed the submitted Flood Risk Assessment & Drainage Strategy and understand that surface water is proposed to be discharged to ground via deep borehole soakaway. It is also understood that mitigation measures are proposed in areas of proposed car parks and vehicle movement. This is acceptable in principle; however further detail will be required on the specific pollution prevention measures and a specific management strategy for the finalised SUDs features proposed. The

design of infiltration SuDS may be difficult or inappropriate in this location. We therefore request that details be secured by a planning condition included in any permission granted. Without this condition we would object to the proposal because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Foul Drainage

5.51 We have reviewed the provided Flood Risk Assessment & Drainage Strategy and understand that foul water is proposed to be discharged to a sewage treatment plant which is to discharge to either ground or surface water. Should discharge to ground be proposed an environmental permit will be required for this development. The permit will restrict the type and location of the non-mains drainage system to be employed on-site. In order to ensure that the planning permission complements the requirements of the environmental permit, a planning condition should be included in any permission granted. It should be noted that the granting of planning permission does not mean that an environmental permit will be accepted for the same proposal. Should a permit application be refused for a proposed drainage strategy (i.e. proximity to foul sewer), we should be consulted on any amended proposals.

5.52 Consider that planning permission could be granted to the proposed development as submitted if planning conditions are included in line with Paragraph 180 of the NPPF. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

National Highways – No objection

5.53 (17/03/25) Recommend that conditions should be attached to any planning permission that may be granted.

5.54 Our concerns primarily relate to any potential impacts on M25 J3, M26 J2a and M20 J2 which form part of the SRN. We note that M25 J3 in particular currently experiences serious congestion during weekday peak times on the off-slips. We are therefore concerned with the potential for additional trips associated with the proposed development to add to queues and exacerbate capacity issues. The proposed site shares a boundary with the SRN and so we are concerned with matters that will affect the M20 and our boundary.

5.55 National Highways has been in ongoing discussions with the applicant's transport consultants regarding potential impacts on the SRN as a result of these proposals since earlier in 2024. We most recently reviewed and provided comments on the full planning application for the site in January.

5.56 National Highways has now reached agreement that no further assessment is required of the impact at M25 J3 and M20 J2. However, in our most recent response to DHA, to satisfy our concerns regarding development impacts at M25 J3, we requested either a junction capacity assessment should be undertaken, or details of

sufficient mitigation to manage down the number of development trips at this junction be provided.

5.57 We also requested that finalised 'worst case' scenario and mitigated 'vision' scenario AM and PM peak hour turning movement diagrams be presented for the key SRN junctions (including M25 J3) so we could be satisfied with the final level of impact proposed.

5.58 Finally, we requested that the CTMP provided in support of the application should include details of the levels of peak construction traffic and personnel expected at the site.

Traffic Impact

5.59 The applicant has now supplied a revised Technical Note and Transport Assessment which we have reviewed and appears to address the majority of our outstanding concerns.

5.60 We accept the figures now provided for the M25 junction 3 Swanley Interchange in both the 'worst case' and mitigated 'vision' scenarios.

Shuttle Bus Service

5.61 At the time of our most recent response to the application, we advised that we were satisfied with the Travel Planning measures provided to support travel to the site by sustainable modes, particularly the operation of a proposed shuttle bus service. This is proposed to operate three routes serving Swanley, Dartford and Borough Green and Wrotham stations and will be available for use by staff and visitors, with 6 shuttle buses operating in the AM and PM peak. The applicant has also provided measures on how they will promote and support the shuttle bus service such as an app-based booking system for passengers to book their journeys.

5.62 We are satisfied with the level of detail supplied regarding the shuttle bus, however, given that the Travel Plan for the site sets a goal of a minimum of 50% of staff trips to be undertaken by shuttle bus, public bus or lift sharing, and this is the baseline scenario for trip generation which we have reviewed and agreed upon, we required confirmation from the applicant and the Local Planning Authority (LPA) as to how this shuttle bus service would be secured.

5.63 We engaged with Sevenoaks District Council directly regarding this remaining matter to ensure we can be confident that the proposed shuttle bus service will be delivered, particularly given the cross-boundary nature of the application. Sevenoaks District Council has confirmed that the shuttle bus service will be secured via a Section 106 agreement with both Sevenoaks and Tonbridge and Malling Councils working closely together on the drafting of the legal agreement. As such, the service will be secured with both Council's as either a joint or separate Section 106 agreement. We are therefore satisfied that no further action is required from National Highways on this matter.

5.64 It is considered that the other measures outlined in the Framework Travel Plan can also be secured via a standard suitably worded condition placed on the application by the LPA requiring the adoption and ongoing monitoring of the Travel Plan, and therefore National Highways does not require further involvement.

Construction Traffic

5.65 On review of the information provided and due to the proximity of the site to M25 J3, it is unlikely that construction traffic would cause a significant impact on our network.

Drainage

5.66 We requested information related to maintenance of National Highways easement rights for access to the existing balancing pond and or any modifications and further information about the existing drainage system. To help us understand and reduce the risk of impact of the development on our drainage system, we asked that the developer track and trace the drainage system to identify buried drainage infrastructure, drainage covers, chamber and any connections to our network.

5.67 In January 2025, the applicant team confirmed that there are no proposed changes to the balancing pond or to the access paths and ditch/pipe leading to it and so our easement and access rights will be maintained as required. They also advised that as no changes to the drainage system were proposed near our network, surveying of drainage infrastructure will have no relevance or impact on the drainage strategy that was submitted as part of this planning application.

5.68 In liaison with our operation and maintenance provider for the M20, close to the development, we accept that the proposed development is not likely to have an impact on the rate of runoff onto the M20 or our drainage network but require any water to be controlled and any debris and pollution to be prevented from entering our network.

5.69 Water during or subsequent to, and as a result of, construction of the proposed development must result in no change/betterment to the discharge rates onto our network or into our drainage system.

5.70 Debris during or subsequent to, and as a result of, construction of the proposed development must not enter and contribute to blockages and/or pollution onto our network or into our drainage system.

5.71 A suitable condition has been recommended but we advise that whilst we have shared the wording of this condition with the applicant team we are yet to receive confirmation that they are content with the wording. In the interest of expediency, we are submitting our conditional response so that the local planning authority can progress this application in line with their current timetable.

5.72 (04/12/24) Referring to the consultation on a planning application dated 12 November 2024 referenced above, in the vicinity of the M25 J3, M26 J2a and M20 J2 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- Recommend that planning permission not be granted for a specific period.

5.73 The development proposals comprise a 240-room hotel with spa and conference facilities, visitor lodges, a sports pavilion with various courts and a swimming lake, and a relocated driving range with an elite performance centre. Additionally, it features a Sports Turf Academy, new equestrian facilities, and the conversion of South Ash Manor into visitor accommodation and a wedding venue.

5.74 Our concerns primarily relate to any potential impacts on M25 J3, M26 J2a and M20 J2 which form part of the SRN. We note that M25 J3 in particular currently experiences serious congestion during weekday peak times on the off-slips. We are therefore concerned with the potential for additional trips associated with the proposed development to add to queues and exacerbate capacity issues.

Conclusion

5.75 At this stage, we remain unable to accept that the proposals would not affect the safety, reliability and/or operation of the SRN (the tests set out in DfT Circular 01/2022 and DLUHC NPPF2023 [particularly paras 110 to 113]).

Recommendation

5.76 It is recommended that the application should not be granted permission for a period of 3 months, extending until 4 March 2025; unless in the meantime all queries and requirements raised by National Highways are fully resolved and this Holding Recommendation is replaced. This does not fetter the Council's ability, if they so wish, to either refuse the application or agree an extension of time beyond 4 March 2024.

Historic England – No objection

5.77 (20/12/24) These proposals are for a major expansion of the visitor facilities at the London Golf Club. Of relevance to Historic England are the planned minor alterations and much needed repairs to South Ash Manor to enable it to be used as accommodation for events, particularly weddings, alterations to the landscaping around the manor house. There are also several proposed new buildings relatively close to the manor: a group of lodges to the south, a new driving range shelter to the east and a pavilion to the southeast.

5.78 South Ash Manor is a fine 16th century timber-framed house with unusual and well-preserved 16th century paintings inside. It is listed grade II*. Its attractive exterior is greatly enhanced by its rural setting. This setting is limited to the immediate environs of the house. The landform and mature tree cover means that there are no long

views of and from the manor, and one is completely unaware of the presence of the building when travelling along Ash Lane, the closest road.

- 5.79 The proposed renovations and alterations would provide the manor house with a new and sustainable use, which it desperately needs, without harming its significance. Furthermore, the proposed landscaping around the house would improve its setting, with a new boundary wall and hedge to the east would screen the existing car park and golf course. While the proposals involve new development reasonably close to the manor house the enclosed nature of the manor's setting means that these would not harm its significance.
- 5.80 The proposals would meet one of the aims of paragraph 210, which instructs local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 5.81 Historic England has no objection to the application on heritage grounds. We consider that the application meets the requirements of the NPPF, in particular paragraph number 210.

SGN – No objection

- 5.82 (30/12/24) Although SGN has a high-pressure gas pipeline in the vicinity, the safety and integrity of our assets will not be affected by the proposal. However, should your proposal change please contact us immediately and we will re-assess.
- 5.83 The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and, in the document, SGN/WI/SW2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence.

British Horse Society – No objection

- 5.84 (28/01/25) The British Horse Society is the UK's largest equestrian charity, with over 104,000 members, representing the country's 1.3 million riders. We have welcomed the opportunity to work with the applicant's agents in respect to the equestrian provision and our response is restricted to these aspects.
- 5.85 06-Proposal-Pursuits Equestrian Parcel (Design and Access Statement): This document makes reference to the equestrian ride provided through a s106 agreement from a previous planning application. We feel it worthy of comment that there are some improvements to this path which would make it more pleasant and safely accessible for equestrians both resident on site and those in the local area. These are as follows:
- Minor alterations to the path to the eastern side to make the road crossings safer to the public rights of way network to the other side.

- Robust fencing to the boundary on the northern side of the ride to more clearly delineate the path.
- As discussed with the applicants agents, the path to be included within the maintenance schedule for the site to ensure the growth of vegetation, the prompt removal of fly tipping.

Kent Police – No objection

- 5.86 (13/11/24) We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).
- 5.87 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.
- 5.88 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.
- 5.89 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.
- 5.90 Kent Police identify details recommendations for the layout and design of this scheme (set out within response letter).

Kent Fire and Rescue – No objection

- 5.91 (10/03/25) I have reviewed all the documentation and correspondence including the recent documents showing the updated drawing T-21 Revision P3 which shows the swept path for a fire tender via a proposed emergency access route as an alternative to the proposed underpass. I can confirm that where this emergency access route does not go via the underpass, it is my opinion that the emergency access requirements for the Fire and Rescue Service under the above Act have been met.
- 5.92 Please note, any future correspondence should follow a process via the planning control body (PCB) as the authority having jurisdiction (AHJ), once the PCB receive a proposal, they will consult with a Fire Rescue Authority (FRA), at which point observations will be provided in relation to emergency access which is assessed under the County of Kent Act. The PCB is the co-ordinating authority throughout the consultation process and all communications should be directed to them (the case officer). This process is important in preventing any confusion which could arise as a result of direct involvement of other parties at this stage.

- 5.93 (03/12/24) Following my assessment of Fire and Rescue Service emergency access provisions for the application, I would like to make the following observations.
- 5.94 Please ensure all emergency access routes are in accordance with Table 15.2 of ADB Vol 2. I note that the proposed underpass in drawing; T0184-05, Rev 3, where the height clearance is less than the 4m minimum requirements. As this appears to be the only access route within this part of the site, it is in my opinion that the emergency access requirements for the Fire and Rescue Service have not been demonstrated.

Kent Wildlife Trust

- 5.95 (04/03/25) The amended and revised details provide clarity on the nature and size of the buffer zones which will be provided from the adjoining blocks of ancient woodland. The ecological buffer zones will measure at least 15 metres however for some aspects of the development the separation distance between the ancient woodland and the built development is larger than this. The Applicant has stated that they would agree to the inclusion of a condition requiring the submission and approval of a detailed woodland management plan to cover the ancient woodland and proposed buffer zones which is welcome.
- 5.96 Notwithstanding the above the distance provided from infrastructure supporting the proposed hotel and spa development and the ancient woodland to the south (Bouts Hole Great Shaw) would be the minimum distance of 15 metres required by Natural England and the Forestry Commission. As stated within our previous representation Kent Wildlife Trust supports guidance set out by The Woodland Trust which recommends that a 50-metre buffer should be maintained between a development and ancient woodland, including through the construction phase, unless the Applicant can demonstrate very clearly how a smaller buffer would suffice. It is not considered that this has been demonstrated for this element of the proposed development.
- 5.97 The submission provides no detail on how the loss of suitable nesting and foraging habitat for skylark will be compensated for. It is advised that skylark plots are provided either onsite or offsite within neighbouring land. The Applicant's Planning Statement Addendum indicates that the provision of these plots could be secured via a suitably worded condition. A mitigation and management plan should also be provided to include details of the steps that will be taken to ensure the availability of winter food for those species impacted by the development. Again, the Applicant's Planning Statement Addendum indicates that this information, and its implementation, can be provided as part of a woodland/landscape management plan which should be secured by condition.
- 5.98 In the event planning permission is granted it is recommended that a condition is included requiring the submission and implementation of a Construction Environmental Management Plan (CEMP) to ensure appropriate mitigation measures

are put in place to reduce the risk of adverse impacts on the ancient woodland and other sensitive wildlife receptors from construction. The CEMP should be secured via a suitably worded condition which requires detailed mitigation measures for noise, surface water run-off, dust, and light impacts during the construction phase.

- 5.99 Conditions should also be included as part of any permission which require the submission and implementation of an external lighting strategy and a landscape and ecological management plan which covers the application site and provides details on how all of the buffer zones to ancient woodland, hedgerow, and veteran or mature trees will be created and managed as well as the habitats being created and enhanced on site as part of providing a biodiversity net gain.
- 5.100 (04/12/24) Kent Wildlife Trust (KWT) supports guidance set out by The Woodland Trust which recommends that a 50-metre buffer should be maintained between a development and ancient woodland, including through the construction phase, unless the Applicant can demonstrate very clearly how a smaller buffer would suffice. It is not considered that this has been demonstrated for the proposed development.
- 5.101 Notwithstanding the above the submission states that a 15-metre buffer will be provided from all blocks of ancient woodland in line with the standing advice from Natural England and the Forestry Commission. However, when measuring the proposed plans for the hotel and spa, along with its supporting infrastructure, there are areas where the 15-metre buffer to the ancient woodland is not met.
- 5.102 The development fails to adequately compensate for the loss of 'farmland' bird habitat. It is advised that a mitigation and management plan should also be provided to include details of the steps that will be taken to ensure the availability of winter food for those species that are granivorous farmland birds as well as habitat management measures to ensure suitability for breeding ground nesting birds in perpetuity.
- 5.103 It is unclear whether the proposed mitigation measures set out within the External Lighting Impact Assessment report are likely to be effective or enforceable in the long term. This is of particular concern given the range of bat and other nocturnal species the site supports together with the proximity of sensitive ecological receptors to the development.

KCC Flood and Water Management – No objection

- 5.104 (04/12/24) Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Drainage Strategy report prepared by Herrington Consulting (September 2024) and have the following comments to provide:
- 5.105 The LLFA understands from the report that there is proposed to be a substantial increase in the impermeable hardstanding on site from the development. In response, a scheme has been set out to manage the runoff increase from these resulting areas. It is noted that at present, three drainage catchments have been set

out. Two of these catchments would see surface water managed through attenuation and a restricted discharge to existing ponds on site that feeds the wider irrigation system of the golf course. The remaining catchment (split across two areas) is envisaged to be managed through infiltration into deep borehole soakaways within the underlying chalk formation.

5.106 The LLFA raises no objection to the proposal set out; however, note that further work will need to be undertaken to refine the design. To facilitate the detailed design, the LLFA would request that a pre-commencement detailed design condition is attached to any permissions granted. Recommend a condition, along with a verification report condition.

5.107 As part of the detailed design, we would request the following items be considered moving forward:

- Installation and testing of deep borehole soakaways within the areas allotted for infiltration. This is to demonstrate the rates achievable within the formation.
- Adequate pollution treatment for those areas draining to deep borehole soakaways. Demonstration of appropriate pollution controls should follow Chapter 25 of the CIRIA SuDS Manual (2015).
- The permeable paving systems set out within the FRA stretch for long distances. This would need further consideration as to whether these features would suitably act as methods for conveyance over those distances and/or the subsequent frequency of baffles and weirs within the underlying sub-base.
- The potential for 1 in 4 side slopes at the large basin to the rear of the hotel. The purpose of this is to allow for easier maintenance.
- Consideration of permeable liners within the SuDS features proposed within the northern and western catchments. While the LLFA acknowledges that the runoff is proposed to be reused for irrigation, the post-development situation would see rates restricted to greenfield but not volume. We would encourage that permeable liners are used in these areas to encourage percolation into the upper superficial deposits.

KCC Highways and Transportation – No objection

5.108 (07/03/25) The applicant has provided a Transport Technical Note (TTN) dated March 2025 to address the comments previously made by KCC Highways.

5.109 Anecdotal evidence has been provided stating that a 50-seater coach has travelled to site and the carriageway width within the site was sufficient in the major of places to allow the coach and cars to pass each other. The plans also show that there is good forward visibility which enables drivers to be aware of oncoming vehicles.

5.110 In response to the question over traffic numbers travelling along the A20, the results of ATC were provided and this shows there is sufficient spare capacity on the network near to the London Golf site.

- 5.111 Revisions to the swept path analysis have been provided and the updated plans show that the layouts, including parking, can cater for the intended vehicles.
- 5.112 An extension to the 429 service has been explored and after consideration KCC Highways will not be looking to amend the service to run to London Golf, and therefore, we will not be seeking a financial contribution in this instance.
- 5.113 Regarding the Ash Lane underpass, discussions need to take place through the Technical Approval Process, or through a s278 agreement should planning permission be granted, to ensure the underpass can be built to KCC design and adoptable standards. It is understood that the underpass will not be adopted, however Ash Lane carriageway will remain in KCC's control and therefore we need to be confident that the underpass is built to an appropriate standard. Separate to this, I understand discussions are ongoing with KCC Structures and this should be continued through to potential installation.
- 5.114 Acknowledging that a Construction Management Plan has already been included within Appendix 8.2, there may be changes required once a building contractor is appointed and to gain acceptance with KCC's Streetworks team nearer the time, I would request that a condition for a Construction Management Plan be included as part of any planning approval.
- 5.115 I refer to the above planning application and confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:
- The development shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, the Travel Plan shall be put into action and adhered to throughout the life of the development, or that of the Travel Plan itself, whichever is the shorter. It is noted that a Travel Plan has been submitted already, however this will require updating prior to occupation and a monitoring fee of £1,422 will be required and included within any S106 agreement.
 - Submission of a Construction Management Plan before the commencement of any development on site to include the following:
 - (a) Routing of construction and delivery vehicles to / from site.
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel, which may require supporting vehicle tracking/swept paths.
 - (c) Timing of deliveries, avoiding network and school peaks where possible.
 - (d) Provision of wheel washing facilities.
 - (e) Measures to prevent the discharge of surface water onto the highway.
 - (f) Temporary traffic management / signage.

- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing.
- The LPAs to condition use of the Shuttle Bus service for both staff and users, this will need to include a regular 'timetable' for staff to understand when the shuttle bus is likely to be at each rail station, so that journeys can be planned to co-ordinate onward travel. The buses should be available from day one of the development commencing. The service should also run in perpetuity. The phone application should be working from day one of occupation - so that users of the development can travel sustainably to the site.

5.116 (05/12/24) In order to assess the above planning application, a review of the Transport Assessment included within Appendix 8.1 of the Environmental Statement has been undertaken. Additionally, Appendices 8.2, 8.3, 8.4, 9.5, the Design and Access Statement, plus associated drawings with the planning application. This response applies to both Sevenoaks (planning ref: 24/02712) and Tonbridge and Malling (planning ref: 24/01620) applications.

Site Access

- 5.117 The applicant is proposing to continue using the main access to London Golf from Stansted Lane. To serve the Turf Academy it is proposed to use an old access arrangement to Woodend, evidence has been provided as part of Appendix E to show that the access can achieve appropriate visibility splays. Further to this, a Road Safety Audit has been carried out and included within Appendix F. The audit does not pick up any substantive highway issues except for ensuring that the splays can be met by cutting back the hedge. KCC's Arboriculture Team should be contacted before any foliage is trimmed from the highway.
- 5.118 The internal access road, shown within Appendix G, into London Golf may struggle to cater with a coach and a car passing at some points. Ideally, the applicant should show a car passing a coach to ensure that the internal carriageway widths are suitable.
- 5.119 Clarification is required on the potential bus-only access from Ash Lane, which is covered under Passenger Transport heading, as this access point does not appear to be shown within the TA.

Trip Generation and Parking

- 5.120 The Transport Assessment does not provide any context over the existing operation of London Golf (base). Further to this, the expected trip generation from the consented hotel and driving range/practice facilities has not been included as a scenario either (committed development). Plus, a scenario covering this proposed application (cumulative assessment). This detail is necessary to inform the expected trips taking place during the peak weekday hours and the peak hour on a Saturday. Traffic Data has been included as part of Appendix 8.4, it is not clear what scenarios this includes. Additionally, no junction counts have been provided from the surrounding highway network, such as traffic on the A20 at the junction of Stansted

Lane – this leaves the predicted trip generation from the proposals without the necessary background data to fully assess the site impact.

5.121 Spa parking and proposed trip generation – clarification on use by outside public of treatment rooms and use of spa facilities such as swimming pool is sought.

5.122 Conference facilities have been considered within the retreat hotel trip generation, however parking is based on hotel beds, there may be an under provision of parking on the site for the conference use.

Swept Path Analysis

5.123 Drawing numbers T-15 Rev P1, T-16 Rev P1, and T-17 Rev P1 for the different car parking spaces at the end of rows shows various overruns of adjacent car parking spaces and areas beyond those dedicated to the car park. The layouts should be amended to show that vehicles can manoeuvre into spaces without any overrun.

5.124 Also, the applicant should confirm that it is not intended that parking takes place on the area next to the mobility impaired spaces on drawing T-17 Rev P1, as vehicles may use the non-chevron area to park on.

5.125 Refuse vehicle on drawing number T-19 shows overrun of a parking space with the refuse vehicle, if the space is already occupied it may be difficult for the refuse vehicle to access the site unhindered.

Personal Injury Collisions

5.126 The applicant within Appendix C has provided detailed analysis of the personal injury collisions in the area. The analysis shows that the causes cannot be attributed to the existing highway network.

Public Transport

5.127 As part of Section 7.2 of the TA detailing mitigation measures, there is mention of extending the route which links West Kingsdown with Swanley and Dartford, however no detail of the proposals have been provided. The route extension proposal will need to be discussed with KCC Passenger Transport (PT) and a subsequent contribution agreed, which will go into any future S106, should approval of the application be granted.

5.128 It is noted that the Framework Travel Plan, paragraph 5.3.1 mentions "an access on to Ash Lane, restricted to buses only", there does not appear to be any further detail beyond this and clarification is therefore sought from the applicant, discussions to include KCC PT and Development Planning Teams.

Proposed Underpass

5.129 Discussions with KCC's Technical Approval Process should take place to ensure the underpass can be built to KCC design and adoptable standards. I understand

discussions are ongoing with KCC Structures and this should be continued through to installation, should planning be granted.

Construction Management Plan

5.130 A Construction Management Plan has been submitted as Appendix 8.2. The general detail at this stage seems appropriate, however I would request that should the application be granted, discussions with KCC Streetworks should take place to ensure they are content with the proposed routing and other construction details, including the underpass construction.

Travel Plan

5.131 A Framework Travel Plan has been submitted as part of the application. This document will need to be updated during the lifecycle of the project to include the monitoring, review and mitigation stage, should the application be granted. A monitoring fee of £1,422 will need to be conditioned and included as part of the S106.

Arboriculture

5.132 If any trees or shrubs need to be removed from the highway, as part of this planning application, then contact will need to be made with Kent County Council's Arboriculture Team.

Public Rights of Way

5.133 KCC PROW team should be consulted as part of this planning application to ensure that they are content with the proposals.

KCC Public Rights of Way – No objection

5.134 (07/03/25) Further to previous comments regarding the application and the submission of a holding objection pending clarification on a number of points, I have now received the following additional information from the agent:

- PROW should be marked on plans using the County Council digital data and labelled as per the Definitive Map. Done
- Omission of Public Footpath SD258. Added.
- No clear reference or correct labelling of PROW routes on the Masterplan. Updated Landscape plans and Masterplan showing the PRoW network and labelled correctly.
- Landscape Plan appears to show PRoW routes built over. Note revisions to the car park layout to preserve alignment of FP MR604
- Omission of reference to the ROW Improvement Plan. Updated Transport Assessment with reference to the RoWIP
- No extract from the Definitive Map showing the legal alignment of all PROW. Please note updated Transport Assessment and excerpt from ES Chapter 8: Transport and Access using KCC PRoW Definitive Map Extract Base for all PRoW mapping.

- Information regarding construction and demolition, omission of any detail of positive incorporation of PROW upon completion. To be covered by a condition for a Public Rights of Way Management Scheme

5.135 KCC PROW and Access consider the development would have a significant impact on the Network, which is not reflected in the application assessments, e.g. 3.5 year construction period would have long term negative impact on the Network and user amenity, connectivity etc. Measures to retain the amenity and safety of the PROW network and its users during the construction period will be secured by a condition for a Construction Management Plan

5.136 The proposal for the equestrian parcel and the promotion of The Ride brings benefits and is a good opportunity to promote horse riding, walking and cycling and London Golf Club has shown its commitment in the past to responding to the needs of local PROW users eg. permissive routes to the east of Ash Lane.

5.137 KCC would request a sum of £150,000 to improve the route MR200 itself and a further £10,000 for new signage and clearance works across the immediate surrounding network. Please note that the revised submission confirms that the applicant is happy to commit to the requested s106 contributions.

5.138 On this basis I am happy to withdraw my holding objection.

5.139 (17/12/24) Public Rights of Way MR604, MR234, MR604, MR221a (Tonbridge and Malling) and SD258, SD292, SD257, (Sevenoaks) would be affected and there are multiple PROW in the surrounding area wider network which would be significantly impacted.

5.140 KCC PROW and Access place a holding objection on the above application due to:

- Omission of Public Footpath SD258.
- Omission of reference to the Rights of Way Improvement Plan, KCC statutory document.
- No extract from the Definitive Map showing the legal alignment of all PROW; we previously advised that the Applicant should obtain the Definitive Map and Statement from the PROW & Access Team at Kent County Council. This is the only source of the up-to-date record of the PROW (supplied digitally).
- Public rights of way should be marked on plans using the County Council digital data and labelled as per the Definitive Map.
- No clear reference or correct labelling of PROW routes on the Masterplan.
- Landscape Plan appears to show PROW routes built over.
- Information regarding construction and demolition, omission of any detail of positive incorporation of PROW upon completion.
- KCC PROW and Access consider the development would have a significant impact on the Network, which is not reflected in the application assessments, e.g.

3.5 year construction period would have long term negative impact on the Network and user amenity, connectivity etc.

- Overall consider the approach to the PROW Network to be disappointing following on from pre application discussions, and this gives concern regarding potential underestimation of the PROW Network benefits and opportunities.
- No mention of developer contributions for offsite mitigation

5.141 If consent is granted in future, we would require, by means of an appropriately worded condition, that a PROW Management Scheme is provided to be approved by ourselves as Highway Authority prior to the commencement of any works. This should include details of alignment, width, surface, signage; all construction management details; all necessary legal event processes required for diversions and their timeframe to ensure timely and legal progress of the development. Identifies any PRoW to be permanently closed and the alternative route/s including the specification for new routes. The hierarchy for managing affected PRoW should lead with the principle of keeping PRoW open through use of signage and traffic management measures, followed by temporary closures with alternative routes provided for as short a duration as possible. Any temporary closure of a PRoW must be agreed with KCC PROW and Access and an alternative route must be provided to a standard agreed with KCC PROW and Access; any alternative route must be safe and fit for the public to always use – suitable surface, gradient, and distance with no additional road walking between the natural destination points.

5.142 Developer contributions: As included in previous response/engagement, we would also request that a financial contribution, via the appropriate legal mechanism of Section 106 Agreement or CIL funding, is allocated to mitigate the loss of amenity, increased use and subsequent surface improvements that will be required in the wider network as the area is developed. Improvements to the area network will provide off road connectivity to the area facilities, railway station etc. KCC PROW and Access advise that Byway Open to all Traffic, MR200, would be the focus of offsite improvements. The route provides off road connectivity between Stansted and Ash, via South Ash Road. We would request a sum of £150,000, to improve the route itself and a further £10,000 for new signage and clearance works across the immediate surrounding Network.

KCC Heritage – No objection

5.143 (19/02/25) Comments set out in my letter of 19th December are still pertinent, but KCC would like to provide some feedback to the applicant's concerns raised.

5.144 South Ash Manor house is considered to be mainly a 16th century structure but the manorial complex probably dates from 14th century or earlier, and medieval fixtures, fittings, remnant structural material associated with original building, blocked openings, etc may survive. Without an appropriate archaeological survey of the manor building which would provide more detail to the CAT 2001 architectural report, there is potential for as yet unidentified medieval structural remains to be exposed and detrimentally impacted by the internal refurbishment works. I have suggested a

better understanding of the archaeological sensitivity of South Ash Manor house would be helpful and ensure the proposed internal and external works, including the demolition and replacement of the conservatory, are appropriately aware of, and mindful of, significant archaeological structural remains.

- 5.145 South Ash Manor was probably a manorial farm complex from 15th century to late 19th century/early 20th century. There is documentary evidence for a chapel but the location of this is unknown. The Tithe Map does show a building with a curved west end. Comparison of the Tithe Map with the 1st Ed OS map shows substantial changes in the farm buildings layout and location. Could the 17th century South Ash Manor Cottages be on the site of or include the medieval chapel? Early maps do not always reflect a true or accurate picture of presence/absence of archaeological remains. (See attached KCC HER and Tithe Map overlay). There is potential for undocumented structures to have been demolished, or part demolished, to below ground; changes in function of some buildings; and general changes reflecting a variety of medieval and post medieval activities within the complex. So there is potential for archaeological remains below the ground, and above ground (as suggested in the HCUK report eg photos 10, 13, 16 and 17) directly associated with the designated South Ash Manor and South Ash Manor Cottages.
- 5.146 From my review of the submitted data, firstly the proposals for South Ash Manor (Central Cluster) include two new car parks, new turning spaces, remodelling of footpaths, new hedgerow and landscaping. Secondly, contractors implementing the proposed works to this complex will be using the Central Cluster area for storage of materials, contractor facilities, movement of vehicles, etc. Although these two sets of proposed works may seem superficial and/or temporary, both of these could impact on above ground and just below ground archaeology directly associated with South Ash Manor.
- 5.147 A few archaeological test pits within the Central Cluster area could clarify sensitive spots, allow sufficient time and resources for archaeological mitigation measures and ensure protection measures can be put in place in a timely manner, not just in advance but actually fully integrated into any work schedules and programme.
- 5.148 South Ash Manor Stables are not identifiable on the Tithe Map or 1st Ed OS map in its current form. There are two smaller buildings marked instead. The buildings here are part of the 19th century farm courtyard and a key part of South Ash Manor heritage. It may be that either earlier buildings were present, or remains of these earlier buildings are integrated into the current stables building.
- 5.149 The proposals include conversion to residential. This is likely to remove archaeological evidence of the building's stable function or any signs of an earlier, different function. A preliminary archaeological buildings assessment could highlight key features, record them and provide specialist guidance to the conversion team, so the conversion works don't inadvertently disturb or damage significant archaeological evidence but may aim to enhance the heritage character.

5.150 South Ash Cottages are considered to be 17th century – or earlier. Their origins, original function and nature are not clear. The Tithe Map does not clearly show the same building as currently shown on later maps and suggests an alternative building here or close by. As yet unidentified fixtures and fittings reflecting original construction and use may survive within the building. A preliminary archaeological buildings survey might be able to identify such features and provide guidance to the conversion works to ensure the building retains or even has the opportunity to enhance the historic character.

5.151 Although I retain concerns about the approach to archaeology, I note the concerns about undertaking pre-determination evaluation works and I understand there is a need to progress the application at this stage. I welcome the applicant's acceptance of a pre-commencement condition requiring archaeological works, however, in order to secure appropriate archaeological mitigation, I would like to suggest a few conditions which will cover the full range of archaeological works, from palaeolithic potential to archaeological evidence within the historic buildings.

5.152 Recommend conditions are placed on any forthcoming consent.

5.153 (19/12/24) KCC recommend the following additional archaeological assessments are needed prior to determination of this application:

- An archaeological appraisal and impact assessment for South Ash Manor and associated remains;
- A preliminary geo-archaeological evaluation of the entire site with a report including a deposit model.
- Targeted archaeological evaluation on time or place critical elements of the development where preservation in situ of significant archaeology might be difficult to achieve, including test pits within the site of South Ash Manor immediate grounds, for example where the chapel might be or medieval remains or remnants of the farm buildings.

KCC Ecology – No objection

5.154 (14/03/25) We have reviewed the submitted ecological information and we advise that the submitted application provides a good understanding of the ecological interest of the site and if planning permission is granted the following conditions are required:

- Ecological mitigation strategy (informed by review of ecological surveys)
- Habitat creation and enhancement plan.
- Landscape and Ecological Management and Monitoring Plan
- Ecological Enhancement Plan
- Review of lighting plan

5.155 Protected/Notable species: The submitted information has detailed the following has been recorded within the site:

- 3 buildings with roosting bats (common Pipistrelle and brown long eared bats)
- Trees which have potential to support roosting bats.
- At least 9 species of foraging/commuting bats
- 46 species of breeding birds recorded during the breeding bird surveys
- Good population of common Lizards
- Dormouse
- Main and outlier survey

5.156 When we previously commented we highlight concerns on the survey effort for breeding birds, dormouse and bats. Additional information has been submitted and we have reviewed the submitted information to consider if they have addressed our previous comments.

5.157 We highlight that the breeding bird survey guidelines are for at least 6 surveys visits regardless of the location and therefore we don't agree with the approach that only 4 surveys were carried out as it was not near any statutory designated sites. However, agreed that the main impact from the proposal is within grassland habitat and the surveys did cover the main breeding period and the proposal is provided opportunities for breeding birds (if managed correctly). Based on this understanding of the site we accept that no additional surveys are required.

5.158 The initial bat ground level tree assessment submitted as part of the planning application detailed the following: Trees that required a further assessment include: T275, T293, T314, T89, T107, T124, T295 and T173. The information submitted from the applicant has confirmed that these trees are to be retained within the site and therefore we accept that a tree climbing survey is not required – however the lighting must be designed to avoid impacting these trees.

5.159 A further tree survey has been carried out and we are satisfied with the conclusions of that report that the additional trees surveyed do not require tree climbing surveys. A number of trees have been identified that as having some potential as for roosting bats and a precautionary approach is required when the trees are being felled.

5.160 The completed dormouse surveys have been submitted, and the results of the dormouse survey have demonstrated that dormouse have been recorded in additional locations within the site. Dormouse have been confirmed as present within the southern end of the area referred to as the retreat and spa.

5.161 Mitigation: We advise that we are satisfied that suitable mitigation can be incorporated into the red or blue line boundary.

5.162 To mitigate for the impact on protected/notable species habitat creation is being implemented throughout the site with the creation/enhancement of grassland,

woodland and hedgerows. We are satisfied that appropriate species mitigation can be carried out within the site and we advise that if planning permission is granted there will be a need for a detailed ecological mitigation strategy to be submitted as a condition of planning permission.

5.163 To ensure that all the habitat required as part of species mitigation and BNG we advise that a habitat creation plan is submitted as a condition of planning permission.

5.164 3 possible breeding skylarks were recorded within the site and the site will result in the loss of some skylark breeding habitat however we note that the parcels of land in the NE and SW corners of the site are to remain as grassland and therefore there is opportunities for these to be managed to benefit nesting skylarks. In addition, the submitted ecology information has detailed that Weedy margins will be created to benefit foraging farmland birds and this has been confirmed by the applicant.

5.165 Therefore, we are satisfied that if the retained/proposed habitats are managed appropriately there is opportunities for the proposal to improve foraging opportunities within the site for skylarks. We advise that this must be addressed within a site wide landscape and ecological management plan. We are satisfied that this can be submitted as a condition of planning permission.

5.166 The bat mitigation has provided options for integrated bat mitigation and erecting bat boxes within the grounds. The applicant has confirmed that the mitigation features will be integrated into the buildings. This will ensure it can be retained within the site in the long term. We are satisfied that this can be addressed within a detailed ecological mitigation strategy.

5.167 Lighting: A site wide lighting plan has been provided, and it suggests that the lighting has been designed to minimise light spill within the surrounding area with lighting dropping to less than 1.5lux relatively quickly. There is a need to ensure that any lighting installed is fit for purpose but also will ensure that the light spill from it is minimal.

5.168 We recommend that the lighting proposals are reviewed prior to installation to ensure that the best lighting options are being installed which will minimise lighting. We also recommend that timers/dimmers are installed with the lighting to ensure that the lighting is only operational when it is required but if it cannot be switched off overnight lighting can be dimmed. We are satisfied that this point can be addressed via a condition of planning permission.

5.169 Ancient Woodland: The proposal will not result in the direct loss of ancient woodland but there is a need to fully consider the indirect impact from the proposal – this includes impact from recreational pressure, impacts from lighting and reducing the amount of semi natural habitats next ancient woodland. To mitigate against any impact the NE standing advice details that proposed developments should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root

damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.

5.170 Additional information has been provided within the design and access statement has confirmed no built construction will be within a minimum of 15meters of any ancient woodland and the landscaping within the buffer will be designed to minimise access in to the woodland.

5.171 We agree that the proposal has been designed to minimise impacts on the ancient woodland.

5.172 Biodiversity Net Gain: Having reviewed submitted information, we consider this application to fall under mandatory biodiversity net gain so that mandatory biodiversity net gain of 10% will apply. Any application which is required to achieve a 10% BNG must submit the following information as a minimum.

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- the completed metric calculation tool showing the calculations of the predevelopment biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - o a statement to the effect that these activities have been carried out;
 - o the date immediately before these activities were carried out;
 - o the pre-development biodiversity value of the onsite habitat on this date;
 - o the completed metric calculation tool showing the calculations, and
 - o any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

5.173 We advise that sufficient information has been provided with regard to mandated BNG and we are satisfied with the baseline.

- 5.174 Details of the proposed habitat creation has been provided, and it has detailed that a BNG of over 20% for habitats and over 50% for hedgerows can be implemented within the site. We agree that a BNG of over 10% is likely to be achievable.
- 5.175 The applicant has confirmed that the ancient woodland buffer has been taken into account when calculating the BNG. The submitted BNG assessment appears to have taken into consideration the creation of habitats required for species mitigation – for example the habitat required as part of the reptile mitigation has not been enhanced within the metric.
- 5.176 The submitted BNG metric has not included details of the creation of arable weedy strips as part of the breeding bird mitigation. However, the applicant has confirmed that they will be implemented and therefore we do not require the metric to be updated prior to determination of the planning application.
- 5.177 To ensure that all the habitats are established / created as intended we advise that there is a need for a habitat creation/enhancement plan to be submitted as a condition of planning permission.
- 5.178 Due to the types and area of habitat being created and enhanced we advise that the habitat creation must be considered as on site significant and therefore it must be secured via a 106.
- 5.179 Ecological Enhancements: Under section 40 of the NERC Act 2006 and paragraphs 187 and 193 of the NPPF 2024 biodiversity should be maintained and enhanced through the planning system. In addition to BNG we advise that ecological enhancement features must also be incorporated into the site and buildings. We recommend that an enhancement plan is required as a condition of planning permission.
- 5.180 Designated Sites: A habitat regulations assessment has not been submitted but instead information has been included within the ecology chapter, and it has screened out a likely significant impact on the designated sites within 15km.
- 5.181 We advise that the LPA must be satisfied with the conclusion of the transport assessment. Bluebell Hill (A228) and Detling Hill (A249) are both within 200m of the North Downs Woodland SAC. Therefore, if the proposal will result in a higher use of these roads that detailed in the transport assessment an updated assessment on the impact on the SAC will have to be carried out.
- 5.182 (28/01/25) We have reviewed the submitted ecological information, and we advise that the submitted application provides a good understanding of the ecological interest of the site however we advise that additional information is required. The following information is required:

- Additional information on the bat activity surveys, bat tree assessments, dormouse surveys and the breeding bird surveys.
- Clarification on the breeding bird and bat mitigation.
- Clarification on the ancient woodland buffers – for the AW assessment and BNG assessment.
- Clear lighting plan.
- Ecological enhancement plan.

Visit Kent – Support

- 5.183 (06/02/25) I am writing to present the support of Visit Kent in respect of your plans to develop the London Golf resort, in particular the proposal to develop a large scale luxury hotel and spa.
- 5.184 Visit Kent is the official Destination Management Organisation (DMO) and Local Visitor Economy Partnership (LVEP) for Kent championing the county's tourism industry which is worth £4.1bn and supports more than 77,000 jobs. As part of our work, we monitor the trends in the visitor economy to support sustainable economic growth and in our opinion this development would enhance the tourism offering that the county has for visitors. This development aligns with the priorities outlined in the Kent Destination Management Plan (2024 – 2029) to improve the accommodation offer in our county, increasing the supply and quality of accommodation stock.
- 5.185 Having the right type of accommodation on offer will also help attract more visitors to the county who are choosing between multiple UK destinations. The Visit Kent perception research showed that for 30% of visitors the accommodation was the main reason for deciding to visit a particular location and a further 19% stated that it had a significant influence on their destination choice. As Destination CEO for Visit Kent I believe that the development at the London Golf Club will drive off-season visits and economic benefits by creating more opportunities for visitors to stay longer and as a result, spend more money in the area.
- 5.186 The proposed hotel development, providing in excess of 240 bedrooms will be a game-changer for the visitor economy in Kent. It will allow us to proactively attract the high-spending international travel trade market, as well as hosting major conferences and incentive travel. We, at Visit Kent, know that there is strong demand from these sectors which our current bedstock does not allow us to service. With the visitor economy already supporting 11% of all jobs in Kent, this development provides a fantastic opportunity to deliver real growth for the county, high-quality year-round jobs and a wonderful amenity for our local communities.
- 5.187 We hope that your application is successful, and we are happy for our views to be presented in support of this application.

TMBC Waste Services – No objection

- 5.188 (13/11/24) No comments from Waste Services as this will be totally commercial based waste.

TMBC Economic Development – Support

5.189 (27/11/24) Our Economic Development Strategy 2023-2027 sets out a vision of “Maximising the unique strengths of the local area to help create a resilient, dynamic and inclusive economy that fosters sustainable growth”. This vision is underpinned by a total of 7 themes, a number of which will be positively impacted by this proposal, including:

- Promoting the borough: the applicant and agent have had early stage discussions with Visit Kent about the proposals and it is clear that the proposal offers something new and different to Kent that can be positively promoted to visitors. Previous studies commissioned by Visit Kent have highlighted that there is a lack of larger, high quality visitor accommodation in the County that would be partly mitigated through this development.
- Supporting Local Business: London Golf Club is a well-established business that the Council has worked with and supported over a number of years.
- A Greener more Productive Economy: the approach to sustainable design and Biodiversity Net Gain whilst at the same time generating considerable economic benefits is a noteworthy example of supporting both ecological and economic growth.
- A Thriving Rural Economy: the proposal will directly generate in the region of an additional 350 FTE jobs into the rural economy, plus further indirect jobs generated through supply chains.

5.190 As such, from an economic development perspective, I would be fully supportive of this application.

TMBC Environmental Protection – No objection

5.191 (05/03/25) Noise: Chapter 10 of the Applicant’s Environmental Statement looks at noise, both from the construction of the proposal and its operation. I am content with this submission. For the construction element – most likely to be the noisiest (albeit shorter term) element – their calculations indicate levels below the Significant Observed Adverse Effect Limit (SOAEL), which I believe have been derived using the ABC method at Table E1 of BS5228-1. This is, at least in part, due to the comparatively large distances between the areas of work and the nearest noise sensitive receptors. For the operational assessment, of particular concern would be bass noise levels from the wedding venue. This is mentioned at para 4.16 of the Operational Sound Assessment and is due to be reviewed at the technical design stage. I would thus anticipate receiving further information on this specific aspect. Section 5 of this Assessment looks at building services noise (typically air handling units and the like). They have proposed the Rating Levels (L_{Ar},Tr) from all such units when combined to be no more than 5dB below existing background levels (L_{A90,T}) [ref BS4142] at noise sensitive receptors and I would agree with this.

5.192 Light: Chapter 14 of the Applicant’s Environmental Statement looks at light. The Applicant has assessed the site as being in Environmental Zone E1 and indicated

that lighting should not have an undue impact upon nearby residents. I am again content with this. The Applicant should be required to provide specific details of the lighting scheme, to include a layout plan with beam orientation, a schedule of proposed light equipment (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill and the nearest affected building. The Development shall thereafter be carried out in accordance with the conditioned details and maintained as such thereafter.

- 5.193 (29/11/24) Contamination: Based on the review of: Preliminary Risk Assessment (GB Card & Partners, 16/04/2024). The report presents the findings of a desk study and site walkover. It adequately reviews the history and environmental setting of the site. No significant sources of contamination have been identified, and as such no further investigation is recommended. It is noted that intrusive investigation of ground dissolution features is recommended, and as such advice should be sought from Building Control on this matter. Although no further investigation of contamination issues is recommended, due to the large size of the site, I would recommend a watching brief condition to safeguard against any potential sources that may have been missed during the initial site walkover.

Conservation and Urban Design Officer – No objection

Heritage

- 5.194 The planning application includes a change of use of South Ash Manor to wedding venue, and associated landscaping. The listed building consent covers the necessary alterations related to the change of use, as well as essential repairs and upgrading.
- 5.195 South Ash Manor is a grade II* listed building within the grounds of the London Golf Club. The building straddles two council areas; Sevenoaks District Council and Tonbridge and Malling Borough Council. It dates from the 16th century, but has been altered in the 17th, 18th, 19th and 20th century. The result is an idiosyncratic mix of the different fashions of the time, and a remarkable surviving 16th century porch and painted parlour. Two figurines were attached on brackets to the porch, but have been dated to the 13th century and so clearly came from a different source and reused at the property. The careful storage of these and replicas for the porch form part of this application.

Planning Application effect on heritage significance

- 5.196 South Ash Manor was the centre of a historic farmstead, as noted on the Kent Historic Environment Record. The landscaping alterations for the new use, however, are limited to the former residential curtilage rather than within the farmstead, as the former farm buildings are in other uses. There will be some enhancements as the soft landscaping is overgrown and scrubby. The wider changes to its setting, most notably the new holiday cabins and the hotel, will not be noticeable as part of the experience of the former house within its farmstead setting, and there are many intervening features such as tree belts and roads. The overall effect will be that the significance of the building is sustained, provided that we have details via condition of the hard and soft landscaping.

Design

5.197 The design process for the comprehensive upgrading of the golf club offering has been lengthy and included public consultations and extensive pre-application discussions with both local authorities. I provided comments on the emerging proposals in writing and also at the last Teams meeting prior to submission, and in my view the concerns that I raised over quality design and placemaking, as per Chapter 12 of the NPPF and the National Design Guide, have been addressed. These comments principally address the proposed new developments within the TMBC boundary, and not those within the SDC boundary, though they have been considered in the round.

Hotel

5.198 In my view the final design of the hotel sits well within its context and the horizontal emphasis is softened with the balconies and proposed planting. I note and support that the hotel management of the planting will be contracted, to maintain the softening of the hard horizontal lines – you may wish to confirm this via condition or other mechanism. The materiality of this large (but visually embedded) new structure will need careful scrutiny, so I would suggest a condition that physical samples be made available to view on site before the details are agreed in writing.

Lodges

5.199 It is agreed that the timber cladding for the lodges located in the TMBC boundary on the southern and eastern side is appropriate to the natural and man-made landscape context and will help them to blend in with the surroundings. I'm pleased there will be no fencing boundary treatments between them, or driveways hardening the landscaping of the surroundings. The south cottages also will not be fenced off from the ancient woodland but the architecture and orientation will discourage use. A gabion retaining wall is proposed, again to keep the surroundings natural in appearance and character. The south lodges reflect a form of contemporary tree houses in contrast to the other simple rectangular/gable ended lodges which provide architectural clues as to the users of each as proposed in the masterplan. All of this is supported.

Pursuits Building

5.200 The geometry of this building is also organic, like the hotel, and so is well integrated into the landscape. It is a visually permeable building and so legibility and use will be obvious. I note that the construction as well as the materials palette have been formed with the carbon impact in mind but also to be visually appropriate, which is supported.

Sculpture Park

5.201 This is welcome in principal, but recommend that TMBC guide on how this is procured and managed, including any artist briefs, which could be secured with the permission.

Landscaping

5.202 I note that you will assess the landscape impact, but to confirm I am satisfied that the more urban, or suburban, character of previous iterations of the proposals have been designed out and the new plan based more on the historic landscape character, such as field system boundaries and planting. I assume that you will condition details of a wayfinding strategy so that this is consistent with the overall design.

Conclusion

5.203 The impact of the planning application and the listed building consent application on the heritage significance of the grade II* listed South Ash Manor will, overall, not be harmful, and there are obvious heritage benefits to bringing it back into a use that is better associated with the golf club and therefore better maintained. The extensive proposals for many additional facilities for the golf club as a destination have been carefully considered through extensive consultation and are supported as good design and place making.

TMBC Leisure Services – Support

5.204 (24/02/25) Leisure Services strongly support the proposals being brought forward by the applicant. The London Golf Club is a prestige facility which we are fortunate to have located partially in our borough. The existing courses are of exceptional quality and have been used for international events. The provision of additional golf and ancillary facilities will hopefully attract further high-profile events promoting the sport in the county. The addition of the hotel is particularly important in this case with players wanting to stay close to the course during tournaments. The Council has worked with the club in the past with the development of junior golf including a partnership with its own golf course at Poulton Wood. The Council has also supported the Club in looking to attract the Ryder Cup in the future which it will continue to do. It is important for players to have a pathway as they improve and to have the London Golf Club locally will undoubtedly have an inspirational impact particularly amongst young people. Other non-golf leisure facilities provided as part of the application are also welcomed. The development will clearly act as a boost to the local economy with large high profile events bringing benefits to local businesses, encouraging tourism and providing jobs for local people.

TMBC Tree Officer – No objection

5.205 (18/03/25) I have undertaken a site visit and reviewed the submitted documents in relation to trees and ancient woodland. In summary I raise no objection to the application provided the development is carried out in accordance with the submitted Tree Management Plan (October 2024) and AIA Addendum (February 2024) which are in accordance with BS5837:2012.

5.206 The application seeks to retain the majority of existing trees and planting at the site and has sought to minimise the loss of any trees. I am satisfied with the findings of the surveys and raise no objection to the loss of the trees proposed to be removed.

The tree loss is mitigated by a substantial level of additional planting, largely of native species.

5.207 The development provides adequate buffer zones to Ancient Woodland and I do not consider the development to have a harmful impact upon any ancient woodland in or nearby the site.

5.208 For the above reasons I raise no objection.

Local Representations:

5.209 Site notices were displayed on the 20th November 2024 at fourteen locations surrounding the application site. The application was also publicised in the Kent Messenger (KM) on the 21st November 2024.

5.210 10 responses to the proposal have been received in total, largely opposing the development. The following (summarised) concerns and objections have been raised:

- Impact upon the local roads and transport.
- Highway and pedestrian safety concerns.
- Impact on economy and employment.
- Request the application be heard at planning committee.
- Over intensification of use.
- Care should be taken during construction to avoid congestion and damage to roads.
- Disturbance during construction.
- Visual impact and impact on the countryside.
- Public transport is poor in the area.
- Turf academy is an exciting proposition and it is hoped that work experience opportunities will be made available.
- Pleased to hear that there are plans to include local schools in activities.
- Light and noise pollution.
- Enormous commercial development.
- Little benefit to the local community.
- Impact upon nature and wildlife.
- Impact of large events on small villages.
- Loss of part of the garden of South Ash Manor to a bigger car park.
- Impact upon the historic setting of South Ash Manor.
- Demolition of the conservatory (South Ash Manor).
- Impact upon trees and ancient woodland.
- Impact upon residential amenity.
- Significant increase in built form in comparison to previous approvals.
- Development would set a precedent for the area.
- Significant increase in users at the site.
- Proposals do not preserve the openness of the greenbelt.

- Two storey lodges on the east side of Ash Road are akin to a small housing estate.
- Scale of the pavilion is unnecessary.
- Application fails to demonstrate the need for such a development.
- Proposed development is not inclusive.
- Planting schedule required.
- Out of character with the area.

5.211 The following (summarised) comments have also been received in support of the proposals:

- Commend extensive consultation that the club have carried out.
- Represents an exciting opportunity for the area.
- Welcome employment opportunities.
- Support the restoration of South Ash Manor.

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 CP3: Metropolitan Green Belt
 - o Policy CP6: Separate Identity of Settlements
 - o Policy CP9: Agricultural Land
 - o Policy CP10: Flood Protection
 - o Policy CP14: Development in the Countryside
 - o Policy CP21: Employment Provision
 - o Policy CP24: Achieving a High Quality Environment
 - o Policy CP25: Mitigation of Development Impacts
- Managing Development and the Environment Development Plan Document 2010:
 - o Policy CC1: Mitigation - Sustainable Design
 - o Policy CC2: Mitigation - Waste Minimisation

- Policy CC3: Adaptation - Sustainable Drainage
 - Policy NE2: Habitat Networks
 - Policy NE3: Impact of Development on Biodiversity
 - Policy NE4: Trees, Hedgerows and Woodland
 - Policy SQ1: Landscape and Townscape Protection and Enhancement
 - Policy SQ2: Locally Listed Buildings
 - Policy SQ3: Historic Parks and Gardens
 - Policy SQ4: Air Quality
 - Policy SQ5: Water Supply and Quality
 - Policy SQ6: Noise
 - Policy SQ7: Health and Well-being
 - Policy SQ8: Road Safety
 - Policy SQ9: Crime and Disorder
 - Policy DC1: Re-use of Rural Buildings
 - Policy DC4: Equestrian Activity
 - Policy DC5: Tourism and Leisure in Rural Areas
 - Policy DC6: Rural Lanes
- Development Land Allocation – Development Plan Document 2008
 - Supplementary and other documents:
 - KCC Landscape Assessment of Kent
 - KCC Parking Standards
 - KCC’s Public Rights of Way Improvement Plan 2018 to 2028 (RoWIP)
 - Kent Minerals and Waste Local Plan 2013-30
 - Kent Design SPD
 - TMBC Climate Change Strategy 2020 to 2030

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:

Table 9: TMBC Local Plan Timetable

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 existing London Golf Club site currently comprises 2 no. 18 hole golf courses originally consented in 1990. Since then, there have been two significant planning applications to note approved in 2011 and 2013 for a 130-bed hotel and associated facilities and the relocation of the existing driving range, creation of 9-hole golf course and underpass respectively. These permissions have commenced and are thus extant consents (confirmed by a 2014 lawful development certificate). These extant permissions are a material consideration when determining this application.

Principle of Development

National Policy and Guidance

6.6 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). The NPPF also highlights that planning decisions should recognise and address the specific locational requirements of different sectors (Paragraph 87).

6.7 Paragraph 88 of the NPPF sets out that planning decisions should enable:

- 'a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'*

6.8 Paragraph 89 goes on to set out that *'decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public*

transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'

- 6.9 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).
- 6.10 The proposed development, including the creation of sports and leisure facilities, and the creation of approximately 430 FTE direct gross jobs on site (an increase of 340 FTE direct jobs on site) along with an estimated 480 FTE jobs on average within the construction sector during construction is considered to have significant economic benefits along with social benefits. The proposed development promotes economic growth in the borough and the surrounding areas, supports a prosperous rural economy and would be considered to be in accordance with the guidance and aspirations set out within the above NPPF paragraphs.

Adopted TMBC Policies

- 6.11 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.
- 6.12 Policy CP14 of the Core Strategy relates to development in the countryside and seeks to restrict development to (amongst others) predominantly open recreation uses together with associated essential built infrastructure (h); or (i) any other development for which a rural location is essential.
- 6.13 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. In this context the Golf Club 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 this policy.
- 6.14 Policy DC1 of the Managing Development and the Environment Development Plan Document relates to the re-use of rural buildings. The policy sets out that proposals for the reuse of existing rural buildings that are of permanent and sound construction and capable of conversion without major or complete reconstruction for commercial or tourist development are acceptable where criteria is met. The criterion is summarised below:

- (a) Any alterations proposed as part of the conversion, are of a form, bulk and general design and of materials which are in keeping with the character to the area.
- (b) The proposed use is acceptable in terms of residential and rural amenity, highway impacts and the use of land surrounding the buildings and can be accommodated without requiring the erection of extensions or ancillary buildings.
- (c) The proposal does not result in the fragmentation and/or severance of an agricultural land holding.
- (d) Any landscape scheme is appropriate for its rural location.
- (e) The proposal does not result in a negative impact upon protected species.
- (f) in the case of buildings of architectural or historic interest, conversion would not:
 - be detrimental to the architectural or historic character of the building, including any archaeological interest or may have, its group value with any other historic buildings, or its setting.
 - result in the loss of important features relating to the original fabric, the external character of the building, associated archaeological remains or its internal spatial qualities.

6.15 This policy is applicable to South Ash Manor and the surrounding buildings to create a wedding venue at the site. It is noted that the southern part of South Ash Manor is located within TMBC and the remaining buildings in this part of the site are within SDC.

6.16 Regarding criterion (a) the proposed creation of the wedding venue, through the change of use and re-purposing of existing buildings, does not require extensive alterations or works. The buildings would be considered to retain their more rural character and appearance it is also noted that no extensions to these buildings are proposed. The impact upon residential amenity of the scheme as a whole is discussed later on in the report. Nonetheless the proposed re-use of the buildings, largely due to the separation distance from neighbouring residential properties, would be considered to not have a detrimental impact upon residential amenity. Regarding part (c) the proposal would not result in the fragmentation and/or severance of an agricultural land holding. Landscaping details have been secured by condition and following discussions with KCC Ecology this element of the proposal is considered to not have a detrimental impact upon protected species. In regard to criterion (f) this is discussed with the heritage section of the report, however the Conservation Officer and Historic England are of the view that the proposals would not have a detrimental heritage impact.

6.17 For the above reasons the proposal is considered to comply with Policy DC1 of the Managing Development and the Environment Development Plan Document. The principle of this element is therefore considered to be acceptable.

6.18 Policy DC4 of the Managing Development and the Environment Development Plan Document relates to equestrian activity. The policy comments that permissions will be granted where the following (summarised) criteria is met:

- (a) Where new buildings are proposed it must be demonstrated that the re-use of the existing buildings is not practicable.
- (b) New built form is on an appropriate scale and design appropriate to the locality and would not adversely impact animal welfare.
- (c) The form, design, siting, layout and materials would not detract from the area.
- (d) Environmental and residential amenity is preserved.
- (e) Would not result in the fragmentation of an agricultural holding.
- (f) Take account of biodiversity.
- (g) No hazard to road safety.
- (h) Provision is made for the protection and enhancement of existing rights of way (where applicable).

6.19 The proposed development includes the replacement of existing stable and ancillary structures with 7 new stables and 1 stable/office in the 'Equestrian Parcel' of the application site (solely within SDC). Whilst this proposal would fall outside of TMBC the proposal would be considered to meet the requirements of Policy DC4. It is also noted that a new entrance will be provided from the Equestrian Parcel to provide improved access to 'The Ride' – a permissive path that is used as an equestrian route following the boundary of almost the entire site. In addition enhancements are to be made to nearby PROWs and secured via a S106 agreement.

6.20 Policy DC5 of the Managing Development and the Environment Development Plan Document relates to tourism and leisure. The preamble to this policy comments that The Council is committed to promoting appropriate tourism and leisure opportunities within the borough.

6.21 Policy DC5 confirms that within rural areas, proposals for new tourism and leisure facilities will be permitted subject to a range of criteria including ensuring that:

- (a) proposals, either individually or cumulatively, do not detract from the character of the area in which they are located.
- (b) they are appropriately located and existing buildings are re-used where possible;
- (c) they will support the local economy.
- (d) the amount of any associated new built development is directly related to the proposed use and the minimum required to serve that use.
- (e) the proposal, either individually or cumulatively with other proposals in the vicinity, avoids the irreversible loss of the best and most versatile agricultural land.
- (f) the proposal does not result in the fragmentation and/or severance of an agricultural land holding creating a non-viable agricultural unit.
- (g) full account is taken of any biodiversity interest.
- (h) the proposal is adequately served by the highway network and avoids off-site highway improvements that would have an unacceptable impact on the character of rural lanes and the countryside.
- (i) there is no hazard to road safety;
- (j) suitable provision is made for the protection and, where practicable, the enhancement of the existing rights of way network; and
- (k) there is no unacceptable adverse impact arising from lighting, traffic generation, activity at unsocial hours or noise.

- 6.22 The policy is most applicable to the proposed hotel, lodge accommodation, pursuits and driving range facilities proposed.
- 6.23 Regarding the visual impact and impact upon the character of the area this is discussed later in the report. The proposed development is considered to provide significant economic benefits to the borough and the surroundings and the level of built development and level of accommodation proposed has been established through serviced accommodation needs assessment and market demands.
- 6.24 It is noted that there is an extant permission for a hotel at the site, in a similar location as now proposed, albeit at a lower number of rooms. The planning permission for the approved hotel is now more than 10 years old and significant amendments would be required to update this planning permission to ensure it could meet current day hospitality standards as well as current building design and regulations. It is also acknowledged that the need for such accommodation will have significantly changed since the date of the previous hotel was approved.
- 6.25 The loss of agricultural land has also been discussed in greater detail later in the report, but the proposed development is ultimately not considered to result in the loss of the best and most versatile agricultural land. The proposal would also not result in the fragmentation and/or severance of an agricultural land holding creating a non-viable agricultural unit.
- 6.26 In terms of biodiversity the proposal would result in on site net gain in excess of 20%. The proposal is considered to be adequately served by the highway network, avoids off-site highway improvements, and would not have an unacceptable impact on the character of rural lanes and the countryside.
- 6.27 For the above reasons the proposed development is considered to comply with the aspirations of DC5 of the Managing Development and the Environment Development Plan Document. The principle is therefore considered acceptable.
- 6.28 Whilst the proposed sports turf academy and associated 3G pitch, located within the 'Southern Parcel' of the application site, would fall entirely within SDC there would be no objection to the principle of this development.

Green Belt

- 6.29 The application site is located outside of a defined settlement boundary and within the Metropolitan Green Belt (MGB). The NPPF is more recent than the development plan policies and is therefore the most relevant policy consideration for development affecting the MGB.
- 6.30 Policy CP3 of the Council's Core Strategy establishes the extent and location of the Green Belt in TMBC and notes that Green Belt policy will be applied generally to those areas.

6.31 Paragraph 142 of the NPPF sets out that that government attaches great importance to Green Belts and sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.

6.32 Paragraph 153 of the NPPF states that *'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'* Footnote 55 of the NPPF states that *'Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.'*

6.33 Paragraph 154 of the NPPF lists developments/types of developments that would not constitute inappropriate development within the Green Belt. However, the proposed development would not be considered to fall within one of these exceptions.

6.34 Nonetheless, Paragraph 155 of the NPPF sets out that *'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed⁵⁶;

c. The development would be in a sustainable location, with particular reference to Paragraphs 110 and 115 of this Framework⁵⁷; and

d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.'

6.35 Footnoted 56 and 57 relates specifically to housing developments and traveller sites respectively and are therefore not applicable to this proposed development and application. Paragraph 156 and 157 of the NPPF again relate specifically to housing developments and are therefore not relevant to this application.

6.36 Paragraph 110 of the NPPF highlights that the planning system should actively manage patterns of growth, and that significant development should be focused on locations which are or can be made sustainable by limiting the need to travel along with offering a choice of transport modes. The paragraph does however acknowledge that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

6.37 Paragraph 115 of the NPPF, also referenced within Paragraph 155 above, notes that when assessing applications it should be ensured that sustainable transport modes are prioritised, safe and suitable access to the site can be achieved for all users, transport elements should reflect current national guidance (including the National Design Guide and the National Model Design Code) and that any significant impacts on the transport network or highway safety can be effectively mitigated to an acceptable degree through a vision-led approach.

6.38 Sustainability of the site and highway matters are discussed in greater detail later in this report.

6.39 Referring to the requirements of Paragraph 155 criterion a refers to 'grey belt land'. Grey belt land is defined within the glossary of the NPPF as:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

6.40 Previously developed land (PDL) is again defined within the glossary of the NPPF, however the location of the majority of the proposed elements that make up this application comprises undeveloped land and agricultural land which would not constitute PDL.

6.41 Paragraph 143 of the NPPF identifies that the Green Belt serves five purposes:

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

6.42 For a site to be considered 'grey belt land' it would need to be demonstrated and considered that the site does not strongly contribute to any of purposes (a), (b), or (d) set out within Paragraph 143 above.

6.43 The proposed development would not result in the neighbouring towns or settlements merging and from discussions with the Conservation Officer and Historic England, the development would not be considered to have a detrimental impact upon the setting or special character of any nearby historic town or settlement. The proposed development, including the development of the presently undeveloped Eastern Parcel (land to the east of Ash Lane), is also not considered to strongly contribute to the purposes of part a) of Paragraph 143.

- 6.44 With the above in mind, the site is considered to constitute 'grey belt land'.
- 6.45 The proposed development would therefore be considered to satisfy criterion (a) of Paragraph 155 of the NPPF. Turning to criterion (b) a serviced accommodation needs assessment has been prepared and submitted in support of the application. This has been prepared by a suitable professional.
- 6.46 The assessment identifies that there is a strong opportunity to develop a 240-bedroom hotel and 78 lodges. The opportunity is supported by the performance of selected hotels in proximity to the proposed development, which report occupancies in the high 70s returning to pre-covid levels with rates exceeding 2019 levels. The development also addresses the lack of upper upscale/luxury accommodation facilities in the Southeast. A review of the luxury hotel market to the west and southwest of London, shows similar trends to the local market with growing occupancies and rates.
- 6.47 The site location would likely capture wider demand from London due to its proximity to M25, A2 and strong train links and that there is also the ability to capture international demand due to the proximity to airports, Eurotunnel, the ports of Dover and Folkestone and Eurostar. There is considered to be both a leisure and corporate demand for such a proposal.
- 6.48 The hotel market section of the assessment comments that the hotel landscape in a 15-mile radius of the proposed hotel has largely remained static in recent years characterised by a strong presence of economy hotels, with the UK's leading brands, Premier Inn and Travelodge, accounting for the largest share of all rooms. Whilst there is significant supply of this type of property, there is a shortage of luxury hotels which offer a wide range of facilities. Research shows that within a 15-mile radius of the site there are no luxury accommodation offerings, the nearest properties are in located towards London, illustrating that there is a significant gap in the market. The submitted assessment notes that there are currently no active luxury schemes in the pipeline and therefore provides a gap in the market, which the proposed development could fill.
- 6.49 Due to the likely target audience/market of the accommodation proposed it is considered unlikely that the development would have a significant impact upon the occupancies of nearby hotels and accommodation offerings. The increased ability of the site to host/accommodate large scale events will likely generate surplus demand that will benefit the local market.
- 6.50 It is considered that the main demand generator would be the leisure sector, who will be drawn to the London Golf Club due to the proposed accommodation offering of proposed lodges and hotel rooms, the proposed facilities, strong location and the wider appeal to the leisure offering in Kent. The inclusion of venue, conference/meeting and event space will assist in cementing the London Golf Club

as a destination to host a variety of events such as weddings, corporate golf days, team building days as well as conferences. Demand is likely to be generated not only from local businesses but also national and international entities due to the accommodation proposed at the site.

- 6.51 It is considered that application has demonstrated that there is an unmet need for the type of development proposed and that the proposal would comply with criterion (b) of Paragraph 155 of the NPPF.
- 6.52 Paragraphs 110 and 115 of the NPPF advocates locating significant development in locations which are or can be made sustainable. In most cases this will be to ensure development is located where modal shift can be encouraged, reducing car dependence, promoting active travel and the use of public transport. These objectives are not ones that are not necessarily considered of primary importance when considering the location of a rural tourist/hospitality destination such as that being proposed in this instance.
- 6.53 Nonetheless, with regards to Paragraph 155(c), the proposals are sustainably located in the sense that they are enhancing and optimising an existing leisure facility and destination, which can be considered the most sustainable approach to development.
- 6.54 The proposals utilise existing and consented accesses including the consented underpass which provides a connection between both parts of the site thereby limiting impact on the surrounding transport network. Whilst it is recognised that the site is located within a rural area and Paragraph 110 of the NPPF acknowledges that the opportunity to maximise sustainable transport solutions will vary between urban and rural areas. Despite its rural location the proposed development has sought to maximise the opportunity for sustainable modes of transport primarily through the provision of a shuttle bus. The proposed shuttle bus service will operate three routes serving Swanley, Dartford and Borough Green and Wrotham stations. The service will benefit staff members and reduce single occupancy car journeys across the local highways network. The shuttle bus can also be utilised for visitors providing a connection between the proposal site and the local railway stations as well as local communities. In addition, a financial contribution which will secure enhancements to a nearby Public Right of Way (MR200) has been secured via the S106.
- 6.55 With reference to Paragraph 115 of the NPPF, the supporting Transport Assessment confirms that every appropriate measure has been taken to prioritise sustainable transport modes; the accesses have been reviewed in accordance with the applicable Design Manual for Roads and Bridges and Manual for Streets Standards as appropriate and that the trip generation assessment has been discussed with officers at National Highways, who have confirmed they are satisfied that the trip rates and generation presented are appropriate for the development.

- 6.56 With the above in mind, it is considered that the proposed development would be in accordance with the requirements of criterion (c) of Paragraph 155 of the NPPF. It is also noted that criterion (d) of Paragraph 155 relates specifically to housing developments and are therefore does not apply to this proposed development.
- 6.57 The proposed development is considered to be in accordance with Paragraph 155 of the NPPF and therefore would not constitute inappropriate development in the Green Belt.
- 6.58 It is also recognised that had the proposed development been considered to not comply with Paragraph 155 and amount to inappropriate development within the Green Belt that there are very special circumstances which would be considered to clearly outweigh any harm. Whether a factor constitutes a very special circumstance is a matter for the decision maker in the exercise of their judgment in any particular case. The categories of what constitute very special circumstances are not closed.
- 6.59 The proposed development generates a number of significant benefits and circumstances which individually and cumulatively would be considered to form 'very special circumstances' capable of outweighing any identified harm to the Green Belt. The very special circumstances are considered to include:

Community Benefits

6.60 In summary, the community benefits would include:

- A new Sports Turf Academy providing training and qualifications in sports grounds horticulture supporting employment within the emerging sports cluster.
- Community access to the new artificial sports pitch and Sports Turf Academy buildings when not in use for training purposes.
- Public open days to the refurbished Grade II* listed South Ash Manor and new public use of the building for weddings.
- Local community/business use of the hotel's conferencing facilities.
- New local cafes and restaurants accessible to the wider public.
- Creation of pursuits and increased leisure facilities in the borough and local area.
- Enhanced PRoWs and equestrian facilities for local walkers and riders.
- Commitment to a Community Benefits Plan through a legal agreement to secure a community liaison officer to lead a community outreach programme.

6.61 The proposed development would be considered to provide significant benefits to the local economy ranging from opportunities for local employment, employment, skills and training and additional economic spend in the local area. A community benefits plan has been secured via the S106 agreement.

Employment Opportunities

6.62 In summary, the employment opportunities would include:

- There will be a range of different employment opportunities during both the construction and end development phase.

- Estimated that during the construction phase the development could support up to 480 FTE jobs within the construction sector with opportunities from entry-level positions to highly skilled and specialised roles.
- In total, the development is expected to support approximately 430 FTE (gross) jobs on site, an increase of 340 new FTE jobs on site.
- New jobs will provide a range of local employment opportunities across the skills spectrum from entry level to managerial positions, supporting economic containment within the borough.

6.63 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.

6.64 In addition to the creation of a significant level of employment opportunities at the site, there will be significant opportunity for skills and training. This would be primarily through the proposed Sports Turf Academy which would provide training in horticulture, turf and sports grounds maintenance. This would provide invaluable training skills to students from local schools/colleges and local job fairs helping to upskill local people and provide unparalleled opportunities for those seeking a career in the grounds keeping, horticulture or mechanical sector.

Economic Benefits

- 6.65 The application is accompanied by an Economics and Community Benefits Statement. The statement sets out that the proposed development and associated jobs would also generate a number of local financial benefits including from employee spending, spending by visitors, Gross Value Added (GVA) and business rates revenue. The increase in employees on-site has the potential to generate up to £1.1 million per year in additional employee spending. A proportion of which is likely to be captured within the surrounding area. Visitors including specifically overnight guests could generate approximately £8.4 million per year in visitor spending and the new jobs are estimated to generate approximately £11.7 million per year in GVA. Finally, there would be an uplift in business rate revenue a proportion of which would be retained by TMBC to spend on local priorities.
- 6.66 The proposed development would enable the club to be competitive in bidding to host national and international golfing tournaments, most notably the Ryder Cup. The Club has bid to host the Ryder Cup in 2031 or 2035, and the expansion of facilities would be considered to help strengthen the club's bid.
- 6.67 Hosting large scale events would provide significant opportunity to generate tourism and trade for the borough, as well as raising both borough's/district's international profile as a sporting destination. The economic and community benefits of hosting such events are multifaceted and include an economic boost to the tourist sector; international recognition and reputation that in turn enhances the region's profile and assist to attract investment and business opportunities and legacy benefits to businesses, communities and residents.

Advancing National Sport

6.68 The Callaway Elite Performance Centre would be one of the world's premier facilities for tour player support and golf equipment fitting providing an unprecedented facility that would assist in advancing golf as a national and international sport by attracting the best players in the world to Kent (and the borough) enabling them to advance their game and raising the profile of the club. This facility will further endorse the clubs aspiration to promote golf on a global level and increase the prospect of securing international tournaments played at the club. The benefits of the club hosting larger scale events has been discussed above.

Biodiversity and Landscape Enhancements

6.69 The landscape proposals ensure that there will be over 20% biodiversity net gain across the site, which is considered to be exemplary in the context of a largely greenfield site, significantly exceeding the Government's target of 10% biodiversity net gain and is therefore considered to be a significant benefit of the development. It is also pertinent to note that the biodiversity gain in hedgerow units is significant across the development, at over 50%.

Sustainability Measures

6.70 The ambition of the development is to deliver a net zero carbon development (or as close as possible). The proposed development presents a significant opportunity to deliver against this ambition and sustainability has therefore been considered throughout the design of the proposals to ensure that the highest standards of sustainability are incorporated. An exemplary sustainable development is proposed, significantly exceeding relevant planning policies and guidance with a net zero strategy based on the following measures and approaches:

- Sustainable use and optimisation of an existing site and facility, building on what the club already has to offer.
- Energy efficient design of buildings promoting low energy usage.
- The use of ground source heat pumps and air source heat pumps for heating and cooling.
- Incorporation of highly energy-efficient ventilation technologies offering a high degree of heat recovery.
- Incorporation of renewable energy measures in the form of photovoltaic panels.
- Refurbishment to listed buildings to help reduce energy demands whilst preserving their historic fabric.
- A considered approach to the specification and resourcing of materials with high embodied carbon emissions focusing on exploring alternatives to traditional concrete mixes, seeking to use steel with high recycled content and reducing waste as far as possible.
- A high standard of water efficiency alongside water recycling and sustainable drainage measures.
- Extensive landscaping and ecological enhancements.

- Significant improvement in the sustainability credentials of the hotel against the extant planning permission, including but not limited to commitments to PV, green roofs, and a 48% carbon reduction compared to 10% in the extant hotel permission through the use of sustainable materials.

6.71 In addition to the above strategy associated with this planning application, the club is pursuing several key sustainability accreditations:

- The club is seeking GEO Certification which is the most widely regarded and credible sustainability distinction in golf, awarded to golf facilities around the world that meet the international standard of best practice and demonstrate a commitment to a sustainability journey, looking to do ever more for social and environmental value. This accords not only with the environmentally conscious approach to course management but also builds on the social and charitable work the club plays in the local community and its drive towards more inclusive promotion of golf.
- The club is also pursuing Green Mark accreditation which is a comprehensive framework for evaluating the environmental performance and sustainability of buildings.

Need for Development

6.72 As discussed earlier in the report it is considered that the application has adequately demonstrated that there is a need for such a development. It is considered that there is a demonstrable need for high quality accommodation in the area and a development of this nature in this location provides significant benefits to the borough and wider area along with ensuring the ongoing success of the golf club and rural enterprise.

Lack of Alternative Sites

6.73 The extent of the planning application boundary has principally been defined by the extent of the applicant's site ownership and responsibility over the land within the site. The proposals are considered to be located on the most appropriate parts of the club's wider site ensuring that the two 18-hole golf courses remain unchanged and in operation as part of the application and ensuring that the impact of the proposals is minimised. The proposal to locate the development on the existing golf club site means that the existing facilities and proposed new facilities benefit from operational efficiencies such as car parking, traffic movements, and delivery and servicing. On this basis it is considered that no alternative sites are available.

Summary (VSCs)

6.74 With the above in mind, it is considered that the proposed development generates a number of significant benefits and circumstances which individually and cumulatively are considered to form 'very special circumstances' capable of outweighing any identified harm to the Green Belt.

Summary (Green Belt)

6.75 The proposed development is considered to comply with Paragraph 155 of the NPPF and therefore does not constitute inappropriate development in the Green Belt. In any case it is considered that there are 'very special circumstances' capable of outweighing any identified harm to the Green Belt.

6.76 The proposed development is thus considered to be acceptable in Green Belt terms.

Sustainability

6.77 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.'

6.78 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

6.79 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.

6.80 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.

6.81 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

6.82 The proposed development provides a range of facilities and services that would enhance the offerings available in the locality. These include the restoration of South Ash Manor and the offering of open days to the property, community access to a 3G pitch, training and educational opportunities through the creation of a turf academy, the addition of café and restaurant along with pursuits provisions. The proposed development would be considered to promote social interaction,

6.83 In terms of principle of the development it would provide a range of employment opportunities, which would contribute to the creation of sustainable communities in the near vicinity. The site also offers good connectivity with the existing highway network travelling being situated to the immediate east of the M20 and to the north of Lonon Road (A20).

6.84 In terms of pedestrian links, there are a number of Public Rights of Way which either run adjacent or across the site. Enhancement to the PROW (M200) along with signage have been secured as a contribution and would enhance the linkage to the nearby village of Stansted as well as improve an existing horse-riding route. The proposal is considered to include good pedestrian links and that the proposals would improve pedestrian/cycle links into the site as well as encourage train users to walk, cycle or travel by shuttle bus to the site.

6.85 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 in to consideration, the proposal is considered to offer some good attributes and would be sustainable from a social perspective.

Environmental objective

6.86 In terms of the environmental objectives, the site is within a relatively sensitive location being located within the countryside, adjacent to Public Rights of Way and a rural lane. Parts of the site comprise agricultural land, devoid of built form and the application site generally has strong boundaries of trees and hedgerows along with a tree lines and pockets of woodland.

6.87 Much of the boundary hedgerows and trees form a significant element to the character of the site and its rural 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. This is mostly considered to be the case for the 'Eastern Parcel'. The proposed development has taken a landscape led approach with the siting, scale and design

and built form aspiring to respect the sites sensitive rural context, topography and visibility. The proposed built form is considered to have been sensitively located and design to respect its context and is of a high standard. 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 exiting golf club site and built form. It is also noted that the proposal includes extensive planting and landscape to further soften the impact of the proposal. The undeveloped parts of the site would include landscaped areas within the site and would be secured under a Landscape and Ecological Management Plan (LEMP) (discussed in more details later in this report) providing some landscape mitigation.

- 6.88 The 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 could 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).
- 6.89 Whilst there would clearly be some landscape harm by virtue of the introduction of the development, most notable on the 'Eastern Parcel', this harm would be reduced by virtue of the design qualities and landscape mitigation secured within this scheme. The environmental harm is to some extent limited by virtue of the fact that the site benefits from extant permissions. Furthermore, the development and future management offers the opportunities to safeguard and appropriately manage the wider site, landscaping and woodland 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.

Loss of Agricultural Land

- 6.90 Paragraph 187(b) of the NPPF sets out that planning 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.
- 6.91 Policy CP9 of the Council's Core Strategy identifies that development of the best and most versatile land will be not be proposed unless there is an overriding need, and that there is no suitable site in a sustainable location on land of poorer agricultural quality or alternative sites have greater value for their landscape, biodiversity, amenity, heritage or natural resources or are subject to other constraints such as flooding.
- 6.92 The application site falls within Grade 3 of the Agricultural Land Classification (where Grade 1 is considered to be excellent and Grade 5 considered to be very poor). The proposed development would result in the loss of undeveloped agricultural land in the 'Eastern Parcel' of the application on land to the east of Ash Lane. It is understood that this parcel has been used informally as grazing land for sheep.

- 6.93 The northern part of the Eastern Parcel has previously been granted consent for a driving range and the southern part has previously been granted consent for a 9 hole golf course. It has therefore previously been considered that the loss of these parcel of land for agricultural use has not been considered unacceptable. It is also recognised that the previous permissions are extant and could therefore be fully implemented on this Eastern Parcel.
- 6.94 This Eastern Parcel does also not form part of a wider holding and is of a relatively limited size as a standalone agricultural holding. There are a number of features in and around the site such as the central tree belt, Public Right of Way (running across this parcel) along with the topography that restricts the range of crops that can be grown and the manner in which they can be cultivated. Cultivation in this location will also be restricted by seasonal wetness. It is also noted that there is no agricultural infrastructure on site such that its loss would compromise operation of the wider agricultural operations.
- 6.95 Based on the above there is no objection in regard to the loss of the site as agricultural land.
- 6.96 Notwithstanding the above, it is also considered that other material considerations relevant to this proposal, being the very significant economic benefits of the proposed development as outlined above would outweigh the harm caused by the loss of this land for agricultural purposes.

Summary

- 6.97 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.

Landscape and Visual Impact

- 6.98 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 onto 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.
- 6.99 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).

6.100 Policy CP6 (Separate Identity of Settlements) of the Council's Core Strategy sets out that development should not result in settlements being joined together and that the green wedges that separate villages and the areas of local landscape importance that enhance their setting should therefore be protected. Development should also not take place where it would result in a loss of local character and individual identity. Development should enhance the setting of settlements. Policy CP14 (Development in the Countryside) generally seeks to limit development within the countryside.

6.101 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.

6.102 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.

6.103 The application is supported by a detailed Landscape Strategy and Landscape and Visual Impact Assessment, prepared by a suitable professional. The proposed development and design is landscape led seeking to minimise its impact upon the landscape and wider countryside. The key principles set out in the Landscape Strategy are:

- To minimise the loss or harm to the existing trees, hedgerows or areas of woodland, avoiding the location of development within Root Protection Areas and ancient woodland buffer zones;
- Propose substantial areas of new indigenous woodland and hedgerow to reinforce existing woodland areas and to create new landscape structures to help integrate the development within the existing landscape, provide habitat for wildlife, visually contain the development and to establish an attractive setting for the development;
- Introduce substantial swathes of managed wild-flower meadow areas of the Site which are currently dominated by mono-cultural agricultural land or highly maintained amenity grassland; and
- Create areas of indigenous marginal planning, together with trees and shrubs associated with wetland habitats in relation to the proposed natural swimming lake, attenuation ponds and SuDS.

6.104 The Landscape and Visual Impact Assessment (LVIA) provides a full assessment of the design proposals. The assessment concludes that the significant long term

adverse visual effects arising from the proposal would be very limited in extent. In respect of landscape impacts, the development is considered to be sensitive to, and in many ways characteristic of the receiving landscape. The built development and associated landscape proposals have been designed to minimise the potential for adverse effects.

- 6.105 The assessment refers to computer generated 'Accurate Visual Representations' of the development, which shows the extent of the built form as wirelines. A total of 26 viewpoints were considered for the visual assessment, which covers short-distance and long-distance views from surrounding roads, PRow's and other vistas, as well as views from within the site itself. Whilst the LVIA does not specifically consider the extant permissions on-site, there is commentary to discuss the landscape and visual benefits of the now proposed development compared to the proposals for the previous hotel and driving range extant permissions. The LVIA considers any likely significant effects during both the demolition and construction phase as well as within the completed development.
- 6.106 The LVIA assessment of effects during the demolition and construction stage considers changes in the site character due to loss of vegetation, changes to landform and introduction of construction plant and machinery on-site. The assessment also discusses the change in tranquillity of the landscape character from construction activities, including the introduction of artificial lighting. Visual effects of construction activities on users of PRow's, road users and existing site users are also considered. The LVIA notes that all effects are temporary in nature and it is noted that the construction period is considered to be relatively short for a development of this scale.
- 6.107 Effects on the site landscape during the construction phase result in a moderate adverse effect whilst the effects on wider landscape and countryside are negligible/would experience no effect, with the exception of a moderate adverse effect on the Ash Downs Local Character Area (LCA). Construction activity effects on the landscape and character of the area would be relatively limited and would be undertaken in the context of background noise associated with the M20 and Brands Hatch.
- 6.108 Effects relating to views of construction machinery and other activities on the site range from no effect / negligible – major adverse during the day-time, with effects reducing in the nighttime. While some significant effects have been identified, it is important to note that the views of construction activities will be glimpsed and screened by existing mature trees and hedgerows. These effects on the views will only be experienced during small stages in the construction period.
- 6.109 The assessment of effects once the Development is built and operational considers effects on site landscape features and character, Landscape Character Areas and visual receptors as a result of introduction of new built form, changes in land use and changes to visual amenity. Artificial lighting associated with buildings, roads, car parks and new sports facilities has also been considered within the assessment of effects on landscape character.

- 6.110 The assessment finds that the effects on landscape receptors vary from no effect to moderate adverse in the first year of operation (Year 1). These effects are reduced by Year 15, due to establishment of the proposed landscaping features including species rich hedgerows and new framework of woodland. The vegetation will contribute positively to the key characteristic of a well wooded appearance. Visual effects during the operational stage range from no effect / negligible to moderate adverse in the first year of operation (Year 1). Again, these effects are reduced at Year 15 due to the establishment of proposed planting.
- 6.111 The proposed development is assessed as responding positively to the relevant NPPF and National Design Guide policy and guidance adopting a landscape led approach that seeks to protect the existing and where relevant, ancient woodland and trees and the introduction of an extensive green and blue infrastructure framework into the landscape across the site which ensures that the majority of the site remains open and built form is minimised as far as possible. The high quality of landscape design and layout of the proposals is considered to positively respond to the landscape policy requirements at a national, regional and local level.
- 6.112 The proposed development utilises the existing topography and existing mature trees and vegetation within the application site, which provides natural screening to reduce views into the site. The proposed development is considered to largely follow the topography of the site, following its contours.
- 6.113 The heights and massing of the proposed built form has been designed to minimise the visual intrusion to respect the sites rural context. The built development has largely prioritised the use of previously developed land/land which benefits from previous consent, and land which is already well screened to minimise the views of the development from public vantage points. It is therefore considered that the proposal in respect of heights and massing is compliant with local and national policy.
- 6.114 The proposed hotel is proposed to be partially recessed into the existing landform, which notably reduces its visual mass whilst retaining a close physical and visual relationship with the existing golf course. The proposed hotel is embedded into the landscape of the site ensuring that it minimises its appearance in views across the site by blending into the landscape contours. This means that the proposed hotel which extends to 5 storeys overall gives the appearance of a 4-storey building. The now proposed hotel is less visually intrusive than the previously consented hotel, slotting more harmoniously into the landscape and appearing less intrusive when viewed from nearby public vantage points.
- 6.115 The existing tree and shrubs on-site are to be substantially retained, with appropriate set-back distances of buildings, structures, roads and parking to avoid damage to the root protection areas. Extensive landscaping is also proposed across the site of predominantly native species, including a new native hedgerow along the eastern edge of the Eastern Parcel to link this parcel with the wider network of field boundary hedgerows. The additional planting and landscaping would further soften the visual impact of the proposal and assist with integrating the development into the landscape.

- 6.116 Whilst there would clearly be some landscape harm by virtue of the introduction of the development and built form, most notably on the 'Eastern Parcel', this harm would be reduced by virtue of the high design qualities and landscape mitigation secured within this scheme. The landscape and visual harm is to some extent limited by virtue of the fact that the site benefits from extant permissions. Furthermore, the development and future management offers the opportunities to safeguard and appropriately manage the wider site, landscaping and woodland to secure protection of the features and some long-term benefits.
- 6.117 Details of materials, landscaping and tree protection measures can all be adequately secured via conditions.
- 6.118 It is considered that the benefits of the proposal would outweigh the limited visual and landscape harm as a result of the proposed development. The development therefore does not warrant refusal on such grounds.

Lighting

- 6.119 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.
- 6.120 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 an appropriate lighting scheme is delivered.

National Landscape (formerly known Areas of Outstanding Natural Beauty (AONB))

- 6.121 The North Downs National Landscape is located to the south of the application site (on the opposite side of London Road (A20)). Whilst the site does not fall within this designation the site would be considered to form part of its setting.
- 6.122 Paragraph 189 of the NPPF sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- 6.123 Core Policy 7 (Areas of Outstanding Natural Beauty) of the Council's Core Strategy states that development will not be permitted which would be detrimental to the natural beauty and quiet enjoyment of the area including their landscape, wildlife and geological interest. Any such development must have regard to local distinctiveness and landscape character and use sympathetic materials and appropriate design.
- 6.124 The closest elements of the proposal to the National Landscape are the Sports Turf Academy and Equestrian proposals. Both of these elements fall within SDC and outside of TMBC jurisdiction. The closest proposed built form within TMBC would be the most southern lodges within the 'Eastern Parcel' of the application site. These

lodges would be located in excess of 1.2km from the northern boundary of the national landscape.

- 6.125 The proposed development by virtue of its high quality and landscape led design would not be considered to have detrimental impact upon the setting of the North Downs National Landscape. The proposed development is considered to be sensitive to its setting and has been designed to minimise the impact upon it. The proposal is considered to have regard to the local distinctiveness and landscape character of the area and is appropriate in terms of design and scale. The proposed development is thus not considered to warrant refusal on such grounds.

Highways and Parking

- 6.126 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.'*

- 6.127 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.

- 6.128 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.

- 6.129 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.

- 6.130 Policy DC6 (Rural Lanes) of the Council's Managing Development and the Environment Development Plan seeks to conserve and, where appropriate, enhances the value of rural lanes and that any proposed alterations to a rural lane is the minimum necessary to serve the proposal in terms of highway safety.

Access

- 6.131 The proposed development seeks to largely utilise the golf clubs existing access point from Stansted Lane with access to the 'Eastern Parcel' being via a previously consented underpass under Ash Lane via the existing golf club site. The now proposed underpass is the same as that previously approved at the site. Access to the Southern Parcel and the Equestrian Parcel is via existing access points along the A20 and Stansted Lane respectively.

- 6.132 All guests staying at the lodges and hotel will check in at the hotel reception, where they will transfer their luggage to a golf buggy to drive to their accommodation, while their vehicle is valet parked in the main car park. Guests will not be able to access the lodges by vehicle; buggies will be available for guests to move about the site and walking, wheeling and cycling routes will also be provided. Each lodge is proposed to have their own buggy and cycle parking.
- 6.133 The access to the Southern Parcel on the A20 has been subject to a Stage 1 Road Safety Audit and the only requirement is that the hedges be cut back and maintained beyond the visibility splays. Pedestrian and cyclist access will be via the main site entrance and the local Public Rights of Way network. The internal road layout has been tracked for the necessary vehicles.
- 6.134 Personal Injury Collision (PIC) data for the A20 corridor between the M25 Junction 3 Swanley Interchange and the M26 Junction 2a Wrotham Heath Interchange for the five-year period ending 30th September 2023 has been analysed and submitted in support of the application. It is noted that the majority of the incidents were the result of human error and given this, it is not considered that the proposed development would materially exacerbate the existing highway safety record.
- 6.135 It is considered that the additional traffic generated by the proposal would not have a significant impact on congestion on the local road network during the weekday AM and PM peak periods, reflecting that many of the staff trips will take place outside of the peak periods and similarly, guests/users are likely to avoid the peak periods when arriving and leaving the site. It is also noted that guests will be able to check in and check out at any time and therefore the lack of a changeover day will minimise the occurrence of peak traffic flows.
- 6.136 It is acknowledged that the site is within a rural location, outside of a defined settlement boundary. A range of measures have been proposed within the travel plan (discussed in greater details below) which seek to minimise the need to travel, promotes a shift from private car use to sustainable modes of travel such as public transport and car sharing for work journeys and supports the use of public transport, particularly for long-distance journeys, thereby reducing the impact on the local and strategic road networks.
- 6.137 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.

Parking

- 6.138 The proposed parking provisions are set out in Table 6 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.

6.139 The proposed level of parking to serve the proposed development is considered to be policy compliant and would ensure that there is adequate on-site parking provisions to serve the development. The proposed parking provisions are not considered to result in any detrimental impact upon the highway network or highway safety. It is also recognised, given the size of the wider golf club site, that there are likely further informal parking opportunities. Nonetheless, the proposed formal parking arrangements are considered appropriate to serve the development.

6.140 It is also noted that neither KCC Highways or Highways England have objected or raised concern in regard to the level of parking provisions shown. It is therefore considered that in regard to parking the proposed development is acceptable.

Framework Travel Plan

6.141 The application is supported by a framework 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.

Shuttle Bus Service

6.142 It is proposed that a shuttle bus service for staff and visitors will be provided, connecting the site with local railway stations and local communities. While Borough Green and Wrotham are the nearest train station to the site 'as the crow flies', it is noted that rail travellers to the site, particularly those travelling from London, may choose to travel via Swanley and Dartford stations, which offer shorter train journey times and are within London's Fare Zone 8 where contactless payment can be used.

6.143 It is also acknowledged that while some existing staff at the golf club are drawn from the local area, the significant increase in jobs at the site may result in an increase in staff drawn from surrounding larger urban areas (as well as an increase in workers from the immediate local areas). Therefore, it is proposed that the shuttle bus service operates three routes serving Swanley, Dartford and Borough Green and Wrotham stations. A connecting route between Swanley and Dartford stations is also shown should there be travel demand from the urban areas around Hextable and Wilmington.

6.144 Over the day, the shuttle buses would operate both a scheduled service and an on-demand service for visitors to serve the overall staff trips. The shuttle bus service is proposed to be supported by an app-based system that allows passengers to book their journeys, view live vehicle tracking and for visitors, inform the driver of any delays or updates to their connecting journey.

Public Transport

6.145 Promote the encouragement of public transport use to staff by providing:

- Information with regard to local public transport services. Use of notice boards located in communal areas, with easy-to-read timetables and plans indicating where services can be accessed.
- Staff Travel Information Packs will be produced, detailing local public transport services and
- All users made aware of online information and journey planners.

Lift Sharing

6.146 Lift sharing offers a sustainable travel option with a number of advantages, including easing the parking demands on site, reducing traffic congestion, reducing environmental impact, cost effective and providing social opportunities. The following elements could be introduced to encourage lift sharing:

- Cash out system financial incentive – staff receive a financial or other reward for every day they work on site but do not bring a car.
- Promotion of lift sharing sites.
- Provision of practical advice on car sharing, including publicising the benefits via noticeboards, leaflets and Travel Information Packs for all new staff.
- Creation of an in-house database for staff, to co-ordinate lift sharing opportunities.
- Engagement/ use of a local taxi firm to provide an emergency lift home service, for staff who have car shared.
- Use of Electric/low-emission pool cars.

Electric Vehicles

6.147 Electric vehicle charging points are proposed to be provided throughout the site for both staff and visitors/guests use.

Eco Driver Training and Driver Aids

6.148 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.

6.149 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.

Other Measures

6.150 The plan also seeks to introduce a needs-based car park management system with access to those staff who require the use of a private car for work, who work early or late contracted working hours, have personal mobility difficulties or caring responsibilities that necessitate a car on the journey to and from work. Measures also include parking charges for staff where the income raised is ring-fenced for sustainable travel measures and the promotion of homeworking for staff in admin and back-office roles.

Visitor Travel

6.151 Information on travel options to the site is proposed to be provided to visitors on the booking website and the London Golf Club website. The shuttle bus service is to be highlighted. Guests will also be provided with information on walking and cycling routes and the local public transport networks. Electric vehicle charging points are proposed to be installed for guests to use, further promoting the use of lower emission vehicles.

Summary

6.152 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 the S106.

Public Rights of Way

6.153 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.'*

6.154 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.

6.155 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.

6.156 There are a number of Public Rights of Way that run within or around the application site, providing useful local walking, cycling and horse-riding connections. These rights of way are proposed to be maintained and those within the site enhanced. A financial contribution (£150,000) is also to be secured for the enhancement of M200 which runs along the east boundary of the 'Eastern Parcel' of

the application site and connects to other rights of way leading to Stansted. A contribution to signage has also been agreed.

- 6.157 No diversions or changes to the existing network once the development is complete and operational are proposed under this application. Where the PRowS need to be crossed by users on the site, physical measures are proposed to be installed to slow down site traffic at any crossing points along with the installation of signing and markings to make it clear that priority should be given to users of the right of way.
- 6.158 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 would that the proposal for the equestrian parcel and the promotion of The Ride brings benefits and is a good opportunity to promote horse riding, walking and cycling. The proposed development is therefore considered to be acceptable in this regard.

Heritage and Archaeological

- 6.159 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
- 6.160 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.'*
- 6.161 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.'*
- 6.162 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.
- 6.163 Policy DC1(f) of the Council's adopted Managing Development and the Environment Development Plan seeks to preserve the character of buildings of architectural or historic interest where conversions/change of use are proposed.

- 6.164 The application site lies in an area of potential associated with prehistoric and later activity. Within the application site is South Ash Manor, a medieval manorial complex. The site includes a main timber and masonry residential building of 16th century date, although structural remains of 12th century or earlier may survive. Associated with the main building would have been outbuildings and service buildings. There is archaeological landscape evidence for surrounding formal gardens and wider designed landscaping, with avenue and specimen trees. In addition, there may be structural formal garden remains as well as evidence of planting and kitchen garden layout. Some of the nearby boundaries may be part of a medieval field system. South Ash Manor is a Grade II* listed building but the building and immediately surrounding land are likely to contain a rich variety and range of archaeological medieval remains both above ground, structural and below ground.
- 6.165 A heritage statement/impact assessment has been prepared as part of the application. The proposed change of use and conversion of South Ash Manor to form part of a wider wedding venue is generally considered to have a relatively limited/minimal physical effect on the listed building, and that the interiors will be preserved. The most notable external change would be the removal of an existing conservatory. The proposed internal works are largely limited to redecoration, new carpets and furnishings, and sensitive repairs. The restoration and re-purposing of the building would be considered to noticeably enhance the building and its setting.
- 6.166 It is noted that the associated listed building application (24/01658) for works to South Ash Manor has previously been granted consent. The Conservation Officer has reviewed the application and has considered that the overall effect will be that the significance of the building is sustained, provided hard and soft landscaping details are secured by condition. They consider that the heritage significance of the listed building will, overall, not be harmful, and comments that there are notable heritage benefits to bringing the property back into a use that is better associated with the golf club and therefore better maintained. It is also noted that Historic England raise no objection to the proposal.
- 6.167 The proposed works to South Ash Manor and its immediate surroundings would not be considered to have a detrimental impact upon the setting of other nearby and surrounding heritage assets. A phasing plan condition has been attached to ensure that the works to South Ash Manor are carried out in a timely manner.
- 6.168 Archaeological assessments have been submitted in support of the application. The application site is considered to have high potential for archaeological remains. The assessments identify a moderate potential for remains of a Palaeolithic and Mesolithic date and a high potential for archaeological remains associated with the Medieval, Post Medieval and Modern periods. Remains would likely relate to the agricultural activities such as ploughing, land division and drainage. The area surrounding South Ash Manor has a high potential for remains associated with an earlier Medieval structure, as well as activities associated with the Medieval and Post Medieval house and then subsequent conversion into a farmstead.
- 6.169 From discussions with KCC Heritage it is considered that the application, subject to conditions, would not warrant refusal on heritage grounds and would not have an

unacceptable impact regarding archaeology. The conditions attached cover geo-archaeological and Palaeolithic potential, archaeological monitoring and recording for works to the historic buildings, prehistoric and later archaeological potential and dissemination of the heritage of the site to visitors. Subject to these conditions the proposal is considered to be acceptable in archaeological terms.

- 6.170 Based upon the above it is considered that the proposed development would provide significant benefits in heritage terms. Most notably through bringing a presently vacant and disused grade II* listed building back into an active use and ensuring its preservation and longevity. The proposal is therefore considered to be acceptable in this regard. It is also considered that the proposed development would not have an unacceptable archaeological impact. The proposal is thus, regarding heritage and archaeological matters, considered to be acceptable.

Drainage and Flooding

- 6.171 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.'*
- 6.172 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.
- 6.173 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.
- 6.174 The application site lies within Environment Agency Flood Zone 1, the lowest risk flood zone. The main risk of flooding to the site and the surrounding area is therefore be considered to be from surface water run-off. The proposed development would result in an increased level of hardstanding and impermeable surfacing at the site and as such would likely increase the rate and volume of water discharged from the site. A drainage strategy has thus been prepared in support of the application.
- 6.175 The drainage strategy seeks to discharge runoff via a dual solution comprising discharging runoff to the existing on-site lakes to be re-used for irrigation of the golf course, and infiltration into the ground. Various SuDS have been proposed to manage all the runoff from the proposed development, such as rain gardens, green roofs, swales, permeable paving, geocellular storage tanks, drainage basins and deep borehole soakaways.

- 6.176 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.
- 6.177 The application proposes a sophisticated and custom design of the existing water reuse system on-site, there is a substantial opportunity to recycle a significant volume of additional stormwater runoff within the local catchment. The proposed SuDS strategy is considered to align with national drainage hierarchy guidance and prioritises the most preferred method of surface water management for development: rainwater recycling and water reuse. The proposed strategy provides the Golf Club with a substantially increased supply of water for irrigation, meeting the high demand across the site. Simultaneously, it notably reduces discharge rates into the lakes, lowering them below current greenfield rates. This approach effectively mitigates any risks associated with increased stormwater runoff, ensuring robust and staggered protection against potential flooding.
- 6.178 By combining the provision of thousands of cubic meters of additional water for recycling with the controlled release of this water at a rate below current levels, the strategy offers a uniquely sustainable solution. It directly addresses two key areas in drainage guidance: increasing water availability for recycling and implementing betterment measures. The proposed strategy is considered to ensure that the development would not result in an increased of flooding elsewhere.
- 6.179 Regarding drainage and flooding the proposed development is considered to be acceptable and not warrant refusal on such grounds.

Ecology and Biodiversity Net Gain

- 6.180 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.
- 6.181 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.
- 6.182 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.
- 6.183 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.

- 6.184 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.
- 6.185 To mitigate for the impact upon protected/notable species habitat creation is being implemented throughout the site which includes the creation/enhancement of grassland, woodland and hedgerows. From discussion with KCC it is considered that appropriate species mitigation can be carried out within the site and an ecological mitigation strategy condition has been included.
- 6.186 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 requiring an external lighting strategy to be submitted and approved for each phase of development.
- 6.187 Details of the proposed habitat creation has been provided and it has detailed that a biodiversity net gain (BNG) of over 20% for habitats and over 50% for hedgerows can be implemented within the site. It is therefore considered that a BNG of over 10% is achievable at the site and the proposal goes well beyond the minimum requirements in this regard.
- 6.188 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

- 6.189 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.
- 6.190 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.

- 6.191 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.
- 6.192 An Arboricultural Implications Assessment has been submitted in support of the application confirming that a total of 323 individual trees, groups and woodland edges were inspected. The landscape strategy for the proposals seeks to minimise the loss and harm to the existing trees, hedgerows, and areas of woodland across the site with no development proposed within a 15m buffer zone from the edge of the ancient woodland to ensure their protection.
- 6.193 The vast majority of trees on site are proposed to be retained, with extensive new planting proposed across the site including new trees. A robust tree protection measures plan has been proposed across the development to ensure retained trees are appropriately protected during the works, in accordance with BS 5837:2012. The tree protection measures include protective fencing and also specific ground protection measures around certain trees to ensure their protection throughout the proposed works.
- 6.194 The proposed development largely retains the most valuable and veteran 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 pose safety issues and trees that are classified as BS Category U which are trees which are dead/dying or dangerous. These trees would need removing regardless of the proposed development.
- 6.195 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. The proposal would also not be considered to have an unacceptable impact upon any ancient woodland and would maintain adequate buffer zones.

Residential Amenity

- 6.196 Policy CP1 (Sustainable Development) of the Council's adopted Core Strategy comments that when determining planning applications residential amenity will be preserved.
- 6.197 Policy DC5 (Tourism and Leisure in Rural Areas) of the Managing Development and the Environment Development Plan Document requires notes that within rural areas, there should be no unacceptable adverse impacts which arise from activities at unsocial hours or noise from the Developments.
- 6.198 It is considered that the residential properties likely to be most affected by the proposal are nos 1 and 2 Bouts Cottage (situated along Ash Lane), Ash Place Farm (to the north of the application site) along with the properties situated along Hatham Green Lane and to the north of London Road (A20).

- 6.199 The proposed development by virtue of the location of the proposed built form in relation to nearby properties and separation distances is not considered to cause an unacceptable loss of light, outlook or privacy. The proposed development would also not be considered to have an overbearing impact upon any nearby property.
- 6.200 The proposal would likely result in some additional disturbance to the existing surrounding residential properties, when compared to existing; however, it is noted that the site benefits from previous extant consents and the level of disturbance is not considered to be significant to warrant a refusal on this ground.
- 6.201 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.
- 6.202 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.
- 6.203 A noise assessment has been submitted in support of the application which identifies that there are several sources of sound likely to be generated by the proposed development: demolition and construction noise, off-site road traffic noise, sports activity noise arising from new sports and leisure facilities, amplified music/event noise from wedding function space, and building services.
- 6.204 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. The predicted sports activity noise levels at the selected Noise Sensitive Receptors (NSR) groups are 10dB lower than the relevant daytime baseline noise levels and would therefore not increase the existing daytime noise levels. The predicted LAFmax noise levels are similar to or lower than the lowest measured LAFmax noise levels and are typically lower than the measured average LAeqT noise levels at the NSR groups. In terms of amplified music/event noise, a sensitivity test has been carried out for amplified noise break out from the Barn. Subject to achieving the design targets which are outlined within the noise assessment the effect of amplified music noise on the nearby sensitive receptors would be negligible.
- 6.205 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.
- 6.206 It is also noted that a condition has been attached requiring details of the hours of use of each proposed element of the scheme to preserve residential amenity.

Subject to conditions to restrict hours of use/operation along with appropriate noise mitigation measures the proposed development would be considered to comply with the relevant policy and guidance with regard to noise. The proposed development is not considered to generate such a level of noise that would have such a detrimental impact upon the amenities of nearby properties that would warrant the application being refused on such grounds.

6.207 Based upon the above the proposed development, subject to conditions, is not considered to have an unacceptable impact upon residential amenity.

Energy and Sustainability

6.208 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).

6.209 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.'*

6.210 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.

6.211 The proposed energy and sustainability strategy for the development is to target a net zero carbon development, drawing on innovative materials and technologies to produce a low carbon design. The targeted net zero strategy measures will include an energy efficient design of the buildings which will promote low energy usage with a high standard of insulation for all fabric elements. The installation of photovoltaic (PV) which will generate capacity across the site, in total this could exceed 564kW of renewable power which could offset more than 76 tonnes of CO2 emissions annually.

- 6.212 The inclusion of ground source heat pumps to leverage heat from the ground and efficient air source heat pumps are proposed in some instances across the scheme, where heat extraction from the ground is not possible.
- 6.213 A Biodiversity Net Gain of over 20% 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 South Ash Manor and South Ash Manor Cottages, which will include improved glazing and lighting which will also reduce energy demands.
- 6.214 The energy and sustainability strategy will allow for a total reduction of 352 (tonnes) of CO2 emissions, achieving a 48% CO2 emissions reduction overall. In regard to energy and sustainability the proposed development is considered to result in a highly energy efficient and sustainable development.

Community Engagement

- 6.215 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.'*
- 6.216 The applicant sought extensive pre-application advice from the LPA and Sevenoaks District Council along with a number of statutory consultees. The applicant has also liaised with the following Parish Councils:
- Stansted Parish Council
 - Wrotham Parish Council
 - West Kingsdown Parish Council (SDC)
 - Ash Cum Ridley Parish Council (SDC)
 - Fawkham Parish Council (SDC)
 - Hartley Parish Council (SDC)
- 6.217 In addition, a programme of consultation and engagement activities have included:
- A dedicated consultation website with online feedback forms;
 - An email and telephone number to receive feedback and any enquiries about the proposals;
 - Leaflet distribution to 1,500 residents to outline the proposal, provide details of the website and invite them to the first public consultation event;
 - Creation of and updates to a mailing list of contacts;
 - Emails to local groups, politicians and those active within the community, asking them to distribute details of the consultation via their networks;
 - Three in person public consultation events held locally, providing the opportunity to speak to technical experts on the project team in relation to the proposals;
 - Engagement with Ward Councillors, Parish Councillors, together with senior politicians within each council area; and

- Engagement with local stakeholders including groups such as British Horse Society, Sevenoaks Padel Club, Stansted and Fairseat History Society.
- Engagement with Kent County Council.
- Engagement with local, regional and national education, sport, leisure and tourism stakeholders.
- Engagement with local groups and landowners.

6.218 It is also noted that the consultation website has remained live and been updated as the planning application has progressed. The feedback received from these exercises and discussions have aided the development of the scheme now being considered.

6.219 It is considered that the club and applicant have engaged extensively with the local community, consultees, stakeholders and other interested parties.

Legal Agreement and S106 Contributions

6.220 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.

6.221 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.

6.222 In this instance the LPA, following discussions with statutory consultees have considered the following obligations and financial contributions to be appropriate:

- Restriction of visitor accommodation lodges as holiday accommodation and not as permanent, primary place of residence.
- Restriction of development on the 'Eastern Parcel' with the exception of any temporary planning permissions required in support of major events i.e. car parking.
- Implementation of this planning permission will constitute superseded development thereby superseding the development consented by extant planning permissions 09/03149/FL and 12/01290/FL).
- Deliver South Ash Manor listed building consent works (approved under 24/01658) prior to the occupation of the visitor accommodation.
- Prior to the occurrence of any major events taking place the submission of an Event Management Plan.
- Employment and training obligations in relation to:

- Local employment and training
- Local supply chain commitments
- Opportunities to boost tourism and visitor attraction locally
- Provision of a shuttle bus service available to be used by staff and visitors.
- Travel Plan pursuant to the approved Framework Travel (monitoring fee of £1,422).
- Community Benefits Plan to include but is not limited to:
 - Use of pursuits and equestrian area;
 - Details of community outreach and programmes including school outreach and links to college education programmes etc;
 - Public access to South Ash Manor;
 - Refurbishment and re-use of South Ash Manor;
 - Local business access to conference facilities; and
 - The Sports Turf Academy and associated 3G pitch.
- 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.
- £150,000.00 financial contribution towards improving Public Right of Way MR200.
- £5,000 financial contribution towards new public right of way signage and clearance works across the immediate surrounding network.
- Monitoring fees as applicable, £400 per obligation.

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

Offsite Community Benefit Contribution

6.224 As set out within their comments on the application Stansted Parish Council have requested an offsite community benefit contribution to offset the harm to the Green Belt and assist the Parish in the delivery of several projects to support the existing community, enhance the experience of visitors and result in additional community benefits.

6.225 The Parish have identified that an offsite contribution could support the following (summarised) projects:

- A new village hall (including a café) in Stansted;
- A Multi Use Games Area (MUGA) in the recreation field next to the school;
- Grass verge repairs;
- Pothole repairs;
- install four solar-powered speed signs to highlight car speeds along with planters;
- Replacement maintenance shed;
- Installation of seven benches, 7 set of litter and dog waste bins and a bicycle shelter.

6.226 The proposed development relates largely to a tourist development and the creation of a tourist destination/resort. Due to the nature of the development and facilities

proposed on site it is not considered that the development would significantly increase the pressure upon existing facilities and services within Stansted village. The proposed contribution requests are not considered necessary to make the development acceptable in planning terms, are not considered to be directly related to the development and are not fairly and reasonably related to the kind of development proposed in this instance. The proposed development would not require community mitigation and provisions within the local area that could be justified via a S106 requirement. This contribution has therefore not been sought as it does not meet the relevant tests as set out above.

Other Matters

Land Contamination

6.227 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.

6.228 A risk assessment has been submitted with the application. From discussions with the Council's Environmental Protection Team the assessment appropriately reviews the history and environmental setting of the site and identifies no significant sources of contamination. Although the assessment recommends no further investigation of contamination issue, it is considered, due to the large size of the site, that a contamination watching brief condition is attached to safeguard against any potential sources that may have been missed during the initial site assessment. A condition has thus been attached.

6.229 The proposed development is considered to be acceptable in regard to land contamination matters and is in accordance with the relevant planning policy and guidance.

Construction Management

6.230 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.

Future Precedent

6.231 Concern has been raised that the proposed development if approved would set a precedent in the area. Each application is assessed on its own merits. The application, as set out above, is considered to be in accordance with the relevant planning policy and guidance and is therefore considered to be acceptable.

Skylarks

- 6.232 Both KCC Ecology and Kent Wildlife Trust in their original responses to the application raised some concern in relation to potential impacts on skylarks from the loss of suitable habitat and did not consider that adequate compensation or mitigation had been outlined within the proposals. Kent Wildlife Trust advised that skylark plots should be provided either on-site or off-site within neighbouring land and that a mitigation and management plan should also be provided to include details of the steps that will be taken to secure habitat management measures to ensure suitability for breeding skylarks in perpetuity.
- 6.233 The applicant acknowledged in their updated submission that the proposed development will impact grassland habitat that could support ground nesting species, such as skylark and that skylark nesting takes place between April and August. The majority of the skylark nesting season was surveyed (March-June) and the survey recorded the majority of the skylark activity within the wider golf course habitat that will not be impacted by the proposed development. The proposed development includes significant planting that will provide opportunities for non-nesting birds, and weedy margin and areas of grassland will create opportunities for ground nesting birds. Overall, it is considered that the proposed development will have negligible impact on breeding birds.
- 6.234 KCC ecology provided a further response to the applicant's updated submission noting that despite the evidence of 3 possible breeding skylarks recorded within the site and some proposed loss of skylark breeding habitat it is noted that the parcels of land in the north east and south west corners of the Site are to remain as grassland and therefore there is opportunities for these to be managed to benefit nesting skylarks. In addition, the applicant has confirmed that weedy margins will be created to benefit foraging farmland birds. KCC Ecology are therefore satisfied that if the retained/proposed habitats are managed appropriately there is opportunities for the proposal to improve foraging opportunities within the site for skylarks. KCC ecology requested that this is addressed within a site wide landscape and ecological management plan, which has been secured by planning condition

Security

- 6.235 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.

Conclusion

- 6.236 In conclusion, whilst the proposed development is considered to cause some harm to the landscape by virtue of the introduction of new built development on the undeveloped parts of the site, 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, this harm is considered to be outweighed by the significant economic benefits which would be delivered. It is also noted that the development would also deliver social and environmental benefits,

most notably through the provision of over 20% on site biodiversity net gain. There would also be notable heritage benefits through the restoration of a grade II* listed building.

6.237 Based on the findings as outlined above, the proposal is considered to be sustainable development. It would also provide significant public benefits, which have been outlined earlier and which outweigh the limited harm. The development is considered to be acceptable in highway terms and would provide significant contributions to enhance an existing Public Right of Way. Overall, the proposed development is considered to be acceptable in the overall balance of issues discussed within this report and there are not considered to be any other material planning considerations which would indicate a refusal of planning permission.

6.238 All pre-commencement conditions and contributions 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:

- Restriction of visitor accommodation lodges as holiday accommodation and not as permanent, unrestricted accommodation or a principal or primary place of residence.
- Restriction of development on the 'Eastern Parcel' with the exception of any temporary planning permissions required in support of major events i.e. car parking.
- Implementation of this planning permission will constitute superseded development thereby superseding the development consented by extant planning permissions 09/03149/FL and 12/01290/FL).
- Deliver South Ash Manor listed building consent works (approved under 24/01658) prior to the occupation of the hotel or lodges.
- Prior to the occurrence of any major events taking place the submission of an Event Management Plan.
- Employment and training obligations in relation to:
 - o Local employment and training
 - o Local supply chain commitments
 - o Opportunities to boost tourism and visitor attraction locally
- Provision of a shuttle bus service available to be used by staff and visitors, whilst the development is operational.
- 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 pursuits and equestrian area;
 - o Details of community outreach and programmes including school outreach and links to college education programmes etc;
 - o Public access to South Ash Manor;

- Refurbishment and re-use of South Ash Manor;
- Local business access to conference facilities; and
- The Sports Turf Academy and associated 3G pitch.
- Details of the proposed Community Liaison Officer and contact details of the Community Liaison Officer in writing.
- 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.
- £150,000.00 financial contribution towards improving Public Right of Way MR200.
- £5,000 financial contribution towards new public right of way signage and clearance works across the immediate surrounding network.
- Monitoring fees as applicable, £400 per 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 development shall be carried out in accordance with the approved drawings listed below:
 - Site Location Plan- 23.0100.100.000 P1
 - Clubhouse- Existing Lower Ground Floor Plan 23.0100.100.100 P0
 - Clubhouse- Existing Ground Floor Plan 23.0100.100.101 P0
 - Clubhouse- Existing First Floor Plan 23.0100.100.102 P0
 - Clubhouse- Existing Roof Plan 23.0100.100.10R P0
 - South Ash Manor- Existing Basement Floor 23.0100.100.11B P0
 - South Ash Manor- Existing Ground Floor Plan 23.0100.100.110 P2
 - South Ash Manor- Existing First Floor Plan 23.0100.100.111 P1
 - South Ash Manor- Existing Second Floor Plan 23.0100.100.112 P0
 - South Ash Manor- Existing Roof Plan 23.0100.100.11R P0
 - South Ash Manor Farm Cottage- Existing Elevations 23.0100.100.320 P0
 - South Ash Stable- Existing Elevations 23.0100.100.330 P0
 - South Ash Barn- Existing South- East & North-West Elevations 23.0100.100.340 P0
 - South Ash Barn- Existing South- West & North-East Elevations 23.0100.100.341 P0
 - Driving Range- Existing Elevations 23.0100.100.380 P0
 - Care Home (Sports Turf Academy)- Existing Elevations 23.0100.100.390 P2
 - Kirby Cottages- Existing Elevations 23.0100.100.400 P0

- Equestrian- Existing Elevations 23.0100.100.410 P0
- Proposed Block Plan- 23.0100.200.001 P2
- Proposed Block Plan- Golf Club & Manor 23.0100.200.002 P2
- Proposed Block Plan- Retreat & Spa 01 23.0100.200.003 P1
- Proposed Block Plan- Retreat & Spa 02 23.0100.200.004 P1
- Proposed Block Plan- Pursuits 23.0100.200.005 P1
- Proposed Block Plan- Sports Turf Academy & Pursuits 23.0100.200.006 P1
- Proposed Site Plan- 23.0100.200.011 P1
- Proposed Site Plan- Golf Club & Manor 23.0100.200.012 P2
- Proposed Site Plan- Retreat & Spa 01 23.0100.200.013 P1
- Proposed Site Plan- Retreat & Spa 02 23.0100.200.014 P1
- Proposed Site Plan- Pursuits 23.0100.200.015 P0
- Proposed Site Plan- Sports Turf Academy & Pursuits 23.0100.200.016 P4
- Proposed Site Plan- The Ride & PRow 23.0100.200.020 P1
- Proposed Site Plan- Groundworks Plan 23.0100.200.022 P1
- Proposed Site Plan- Indicative Phasing Programme- 23.0100.200.023 P1
- Proposed Site Plan- Openness Diagram- 23.0100.200.024 P1
- Clubhouse- Proposed Lower Ground Floor Plan 23.0100.200.100 P0
- Clubhouse- Proposed Ground Floor Plan 23.0100.200.101 P0
- Clubhouse- Proposed First Floor 23.0100.200.102 P0
- Clubhouse- Proposed Roof Plan 23.0100.200.10R P0
- South Ash Manor- Proposed Basement Floor Plan 23.0100.200.11B P0
- South Ash Manor- Proposed Ground Floor Plan- 23.0100.200.110 P2
- South Ash Manor- Proposed First Floor Plan- 23.0100.200.111 P1
- South Ash Manor- Proposed Second Floor Plan- 23.0100.200.112 P0
- South Ash Manor- Proposed Roof Plan -23.0100.200.11R P0
- South Ash Manor Farm Cottage- Proposed Floor Plans 23.0100.200.120 P1
- South Ash Stable- Proposed Floor Plans- 23.0100.200.130 P0
- South Ash Barn- Proposed Ground Floor Plan- 23.0100.200.140 P0
- South Ash Barn- Proposed Roof Plan- 23.0100.200.14R P0
- Retreat Hotel- Proposed Lower Ground Floor Plan- 23.0100.200.15B P0
- Retreat Hotel- Proposed Ground Floor Plan- 23.0100.200.150 P0
- Retreat Hotel- Proposed First Floor Plan - 23.0100.200.151 P0
- Retreat Hotel- Proposed Second Floor Plan- 23.0100.200.152 P1
- Retreat Hotel- Proposed Third Floor Plan 23.0100.200.153 P0
- Retreat Hotel- Proposed Roof Plan 23.0100.200.15R P0
- Retreat Lodge 01- Proposed Floor Plans- 23.0100.200.160 P0
- Retreat Lodge 02- Proposed Floor Plans- 23.0100.200.161 P0
- Retreat Lodge 03- Proposed Floor Plans 23.0100.200.162 P0
- Retreat Lodge 04 – Proposed Floor Plans- 23.0100.200.163 P0
- Retreat Lodge 05- Proposed Floor Plans - 23.0100.200.164 P0
- The Pavilion- Proposed Basement Plan- 23.0100.200.17B P0
- The Pavilion- Proposed Ground Floor Plan 23.0100.200.170 P0
- The Pavilion- Proposed Roof Plan 23.0100.200.17R P0
- Driving Range- Proposed Ground Floor Plan- 23.0100.200.180 P0
- Driving Range- Proposed Roof Plan- 23.0100.200.18R P0

- Sports Turf Academy- Proposed Ground Floor Plan- 23.0100.200.190 P4
- Sports Turf Academy- Proposed Roof Plans- 23.0100.200.191 P0
- Kirby Cottages- Proposed Floor Plans - 23.0100.200.200 P0
- Equestrian- Proposed Plans 23.0100.200.210 P1
- Clubhouse- Proposed Elevation 01- 23.0100.200.300 P1
- Clubhouse- Proposed Elevation 02- 23.0100.200.301 P1
- Clubhouse- Proposed Elevation 03-11- 23.0100.200.302 P1
- Clubhouse- Proposed Elevations 12-14- 23.0100.200.303 P2
- South Ash Manor- Proposed North & South Elevations- 23.0100.200.310 P3
- South Ash Manor- Proposed East & West Elevations- 23.0100.200.311 P3
- South Ash Manor Farm Cottage- Proposed Elevations- 23.0100.200.320 P0
- South Ash Stable- Proposed Elevations- 23.0100.200.330 P0
- South Ash Barn- Proposed South-East & North-West Elevations- 23.0100.200.340 P1
- South Ash Barn- Proposed South-West & North-East Elevations- 23.0100.200.341 P1
- Retreat Hotel- Proposed Elevation 01- 23.0100.200.350 P1
- Retreat Hotel- Proposed Elevation 02- 23.0100.200.351 P2
- Retreat Hotel- Proposed Elevations 03 & 04- 23.0100.200.352 P1
- Retreat Hotel- Proposed Elevations 05- 23.0100.200.353 P1
- Retreat Hotel- Proposed Elevation 06- 23.0100.200.354 P1
- Retreat Lodge 01- Proposed Elevations- 23.0100.200.360 P1
- Retreat Lodge 02- Proposed Elevations- 23.0100.200.361 P1
- Retreat Lodge 03- Proposed Elevations- 23.0100.200.362 P1
- Retreat Lodge 04- Proposed Elevations- 23.0100.200.363 P1
- Retreat Lodge 05- Proposed Elevations- 23.0100.200.364 P1
- Retreat Lodge 04- Proposed Side Elevations- 23.0100.200.365 P0
- The Pavilion- Proposed Elevations- 23.0100.200.370 P2
- The Pavilion- Lake House- Proposed Elevations- 23.0100.200.371 P0
- Driving Range- Proposed Elevations 01- 23.0100.200.380 P1
- Driving Range- Proposed Elevations 02- 23.0100.200.381 P1
- Sports Turf Academy- Proposed Elevations 01 & 02- 23.0100.200.390 P2
- Sports Turf Academy- Proposed Elevations 03 & 04- 23.0100.200.391 P1
- Sports Turf Academy- Proposed Elevations 05 & 06- 23.0100.200.392 P1
- Kirby Cottages- Proposed Elevations- 23.0100.200.400 P0
- Equestrian – Proposed Elevations- 23.0100.200.410 P0
- Proposed Site Section A- The Pavilion- 23.0100.200.600 P1
- Proposed Site Section B Woodland Lodges- 23.0100.200.601 P1
- Proposed Site Section C- Retreat Hotel- 23.0100.200.602 P1
- Proposed Site Section D- Driving Range- 23.0100.200.603 P1
- Proposed Site Section E- Sports Turf Academy- 23.0100.200.604 P3
- South Ash Manor- Demolition- Basement Floor- 23.0100.300.11B P0
- South Ash Manor- Demolition- Ground Floor Plan- 23.0100.300.110 P2
- South Ash Manor- Demolition- First Floor Plan- 23.0100.300.111 P1
- South Ash Manor- Demolition- Second Floor Plan- 23.0100.300.112 P0
- South Ash Manor- Demolition- Roof Plan- 23.0100.300.11R P0

- South Ash Manor- Demolition- North & South Elevations- 23.0100.300.310 P3
- South Ash Manor- Demolition- East & West Elevations- 23.0100.300.311 P3
- Proposed Underpass Works- T0184-05 P3
- Landscape Plans
- Site Wide Masterplan GA- LG635-TML-ZZ-ZZ-DR-L-1000-S1- P10
- Extended Masterplan- LG635-TML-ZZ-ZZ-DR-L-1001-S2- P08
- Extended Existing Tree Strategy- LG635-TML-ZZ-ZZ-DR-L-1002-S2- P06
- Extended Masterplan- Proposed Trees Diagram- LG635-TML-ZZ-ZZ-DR-L-1005-S2- P03
- Site Wide Levels GA- LG635-TML-ZZ-ZZDR-L-1010-S2-P03
- South Ash Manor GA- LG635-TML-ZZ-ZZ-DR-L-1200-S2- P07
- South Ash Manor existing trees strategy- LG635-TML-ZZ-ZZ-DR-L-1230-S2-P06
- South Ash Manor Planting GA- LG635-TML-ZZ-ZZ-DR-L-1231-S2- P08
- Hotel Masterplan GA- LG635-TML-ZZ-ZZDR-L-1300-S2-P06
- Hotel Masterplan Levels GA- LG635-TML-ZZ-ZZDR- L-1310-S2-P03
- Hotel Masterplan Existing trees strategy- LG635-TML-ZZ-ZZDR- L-1330-S2-P05
- Hotel Masterplan Planting GA- LG635-TML-ZZ-ZZDR-L-1331-S2-P06
- Driving Range GA- LG635-TML-ZZ-ZZ-DR-L-1400-S2- P06
- Driving Range Levels GA- LG635-TML-ZZ-ZZDR- L-1410-S2-P03
- Driving Range Existing trees strategy- LG635-TML-ZZ-ZZDR-L-1430-S2-P05
- Driving Range Planting GA- LG635-TML-ZZ-ZZDR-L-1430-S2-P06
- Lodges West GA- LG635-TML-ZZ-ZZDR- L-1500-S2-P06
- Lodges West Levels GA- LG635-TML-ZZ-ZZDR-L-1510-S2-P02
- Lodges West Existing trees strategy- LG635-TML-ZZ-ZZDR- L-1530-S2-P05
- Lodges West Planting GA- LG635-TML-ZZ-ZZDR-L-1531-S2-P06
- Lodges East and Tennis Centre GA-1 of 2- LG635-TML-ZZ-ZZ-DR-L-1600-S2- P08
- Lodges East and Tennis Centre GA-2 of 2- LG635-TML-ZZ-ZZ-DR-L-1601-S2- P08
- Lodges East and Tennis Centre Levels GA-1 of 2- LG635-TML-ZZ-ZZDR-L-1610-S2-P03
- Lodges East and Tennis Centre Levels GA-2 of 2- LG635-TML-ZZ-ZZDR-L-1611-S2-P03
- Lodges East and Tennis Centre Existing trees strategy-1 of 2- LG635-TML-ZZ-ZZDR- L-1630-S2-P06
- Lodges East and Tennis Centre Existing trees strategy-2 of 2- LG635-TML-ZZ-ZZDR- L-1631-S2-P06
- Lodges East and Tennis Centre Planting GA-1 of 2- LG635-TML-ZZ-ZZDR- L-1632-S2-P06
- Lodges East and Tennis Centre Planting GA-2 of 2- LG635-TML-ZZ-ZZDR-L-1633-S2-P06
- Lodges South GA- LG635-TML-ZZ-ZZDR-L-1700-S2-P06
- Lodges South Levels GA- LG635-TML-ZZ-ZZDR-L-1710-S2-P02
- Lodges South Existing trees strategy- LG635-TML-ZZ-ZZDR-L-1730-S2-P06

- Lodges South Planting GA- LG635-TML-ZZ-ZZ-DR-L-1731-S2-P07
- Sports Turf Academy GA-1 of 2- LG635-TML-ZZ-ZZ-DR-L-1800-S2- P05
- Sports Turf Academy GA-2 of 2- LG635-TML-ZZ-ZZ-DR-L-1801-S2- P05
- Sports Turf Academy Levels GA- LG635-TML-ZZ-ZZDR-L-1811-S2-P02
- Sports Turf Academy Existing trees strategy-1 of 2- LG635-TML-ZZ-ZZ-DR-L-1830-S2- P06
- Sports Turf Academy Existing trees strategy-2 of 2- LG635-TML-ZZ-ZZ-DR-L-1831-S2- P06
- Sports Turf Academy Planting GA- 1 of 2- LG635-TML-ZZ-ZZ-DR-L-1832-S2-P02 P04
- Sports Turf Academy Planting GA- 2 of 2- LG635-TML-ZZ-ZZ-DR-L-1833-S2-P02 P04
- Proposed planting list LG635-TML-ZZ-ZZDR- L-8000-S2-P03
- Proposed trees list & existing tree strategies key- LG635-TML-ZZ-ZZDR-L-8001-S2-P03

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;
 - Provision 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;
 - 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), 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.

Geo-Archaeological Works

5. Prior to the commencement of development (excluding site preparation works) the following must be secured:
 - i) geo-archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and
 - ii) further geo-archaeological and palaeolithic investigation, recording and reporting, determined by the results of the evaluation, in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority;
 - iii) programme of post excavation assessment and publication.

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

Phased Programme of Archaeological monitoring & recording

6. Prior to commencement of development (excluding site preparation works), the implementation of a phased programme of archaeological building monitoring and recording must be secured in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that archaeological and historic building features are properly examined and recorded.

Archaeological Field Evaluation

7. Prior to the commencement of development (excluding site preparation works), the following must be secured:
 - i) archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and
 - ii) further archaeological investigation, recording and reporting, determined by the results of the evaluation, in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority;
 - iii) programme of post excavation assessment and publication.

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

Landscape, Ecological and Woodland Management Plan

8. Prior to the commencement of works (excluding site preparation works) within each phase, a Landscape, Ecological and Woodland Management Plan (LEWMP) shall be submitted to and approved in writing by the Local Planning Authority.

The content of the LEWMP for each Phase shall include the following:

- a) Description and evaluation of features to be managed;
- b) Ecological trends and constraints on site that might influence management;
- c) Aims and objectives of management;
- d) Appropriate management options for achieving aims and objectives;
- e) Measures to protect and enhance the ancient woodland
- f) Creation and management of buffer zones surrounding ancient woodland;
- g) A strategy for the long-term management of the buffer zone to ensure effectiveness in protection of the ancient woodland;
- h) Schedule of works including timings and responsible parties for the implementation.
- i) Creation and enhancement of habitats; and
- j) The availability of winter food for species impacted by the development.

Reason: To ensure protection and enhancement of the landscape, ecology and the ancient woodland and buffer zone.

Habitat Management Plan and Monitoring Plan

9. Prior to the commencement of the development (excluding site preparation works) within each phase a Habitat Management and Monitoring Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall set out measures to ensure that retained, enhanced and created habitats

within each phase and across the development can support the species recorded prior to the start of development.

Reason: In respect of the ecological interest of the Site and surrounding area.

Sustainable Surface Water Drainage Scheme

10. Prior to the commencement of development (excluding site preparation works) within each phase, a detailed sustainable surface water drainage scheme (SuDS) based on the principles outlined in the Flood Risk Assessment and Drainage Strategy (Revision 4) (September 2024) must be submitted to and approved in writing by the Local Planning Authority for that phase.

The SuDS shall demonstrate that surface water generated by the relevant phase of 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 without increase to flood risk on or off-site.

The SuDS shall also demonstrate:

- i) That silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters;
- ii) 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; and
- iii) In consultation with National Highways measures to mitigate any sediment and/or discharge across the National Highways boundary or into the National Highways drainage system. No surface water shall be permitted to run off from the development hereby permitted on to the Strategic Road Network or into any drainage system connected to the Strategic Road Network. No drainage connections from any part of the development hereby permitted may be made to any Strategic Road Network drainage systems.

The approved SuDS scheme for each phase 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.

Foul Drainage Strategy

11. Prior to commencement of development a foul drainage strategy shall be submitted to and approved in writing by the Local Planning Authority in consultation with the water undertaker and the Environment Agency, detailing the measures proposed to ensure that appropriate foul drainage is implemented with a connection to foul sewer. The foul drainage shall be carried out in accordance with the approved details.

Reason: In order to ensure that the development is adequately served by drainage infrastructure in the interests of public health and the prevention of flooding generally.

Importing and Exporting Soil

12. Prior to the commencement of each phase of development (except for site preparation works) 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

13. No development shall commence until a tree protection scheme has been submitted to and approved in writing by the Local Planning Authority. The protection scheme shall include a timetable for the works; identify the retained trees; where excavations or changes to land levels or underground works are proposed that might affect the root protection area, the scheme shall detail the appropriate working methods (the arboricultural method statement) in accordance with British Standard BS 5837:2021 (Trees in relation to design, demolition and construction). The scheme for the protection of the retained trees shall be carried out as approved.

Reason: To ensure protection of existing trees on-site.

Details of Hard and Soft Landscaping

14. Prior to the commencement of any above ground works within a phase, a scheme of hard and soft landscaping and boundary treatment shall be submitted to and approved by the Local Planning Authority. All planting, seeding and turfing proposed shall be implemented during the first planting season following occupation of the buildings within the relevant phase. Any trees or shrubs removed, dying, being seriously damaged or diseased within 10 years of planting shall be replaced in the next planting season with trees or shrubs of similar size and species.

Reason: In the interests of visual amenity.

Details of External Materials

15. Prior to the commencement of any above ground works within a phase, 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 interests of good design and to ensure that the development does not harm the character and appearance of the area or the visual amenity of the locality.

Secure by Design

16. No development above ground level within each phase 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.

External Lighting Strategy

17. Prior to the commencement of above ground works within each phase full details of the external lighting shall be submitted to and approved in writing by the Local Planning Authority. All external lighting shall be installed strictly in accordance with the approved details. Each area of the development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not cause harm to wildlife and the visual amenity of the locality.

Noise Mitigation Strategy

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

Reason: To preserve surrounding residential amenity.

Unidentified Contamination

19. If during development work, significant deposits of made ground or indicators of potential contamination are discovered that have not been previously identified, the work shall cease and the Local Planning Authority shall be notified immediately. An investigation/remediation strategy shall be agreed with the Local Planning Authority and where remediation if necessary it shall be carried out in accordance with the agreed strategy.

Following completion of measures identified in the approved remediation strategy a verification report must be prepared and submitted to the Local Planning Authority for approval in writing.

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.

Verification Report

20. Prior to the occupation of each phase of development a Verification Report, pertaining to the SuDS, prepared by a suitably competent person, shall be submitted to and approved in writing by the Local Planning Authority.

The Verification Report shall demonstrate that the SuDS is consistent with that which was approved, with 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.

Cycle Parking

21. Prior to the first use within each phase of development, details of cycle parking must be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved cycle parking shall be retained and used only for the purposes of cycle parking.

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

Electric Vehicle Charging Points

22. Prior to the first use within each phase of 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.

Car Parking Management Plan

23. Prior to the first use of each phase of development, a detailed Car Parking Management Plan shall be submitted to and approved in writing by Local Planning Authority. The Car Parking Management Plan shall include details of the allocation of car parking spaces within the development, and measures that would be put in place should additional car parking be required for events to ensure there is no overspill parking onto the surrounding roads that may be harmful to the free flow of traffic on the surrounding highway network.

Reason: In the interests of highway safety.

Deliveries and Servicing Plan

24. Prior to the first use of each phase 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.

Refuse Storage Details

25. Prior to the first use of each phase of the development, details of refuse storage and screening 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, be made available prior to the first use of the relevant phase and be retained as such thereafter.

Reason: To facilitate the collection of waste, preserve visual amenity of the development and to reduce the occurrence of pests.

Public Art Strategy

26. Prior to the first occupation of the hotel 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.

Signage Strategy

27. Prior to first use of each phase of development an associated Signage Strategy shall be submitted to and approved in writing by the Local Planning Authority. Signage required in connection with the 'signage strategy' shall be implemented in accordance with the details approved.

Reason: In the interest of providing appropriate wayfinding signs for users of the site.

Hours of Operation

28. Prior to the first use of each of the elements of the hereby approved development listed below, details of the hours of operations shall be submitted and approved in writing by the Local Planning Authority:

- a) Sports Pavilion & Pursuits;
- b) Hotel and lodges;
- c) Driving Range & Elite Performance Centre;
- d) Wedding venue.

Reason: In the interest of residential amenity.

Heritage Interpretation

29. Prior to the first use of South Ash Manor, a heritage interpretation strategy will be submitted to and approved in writing by the Local Planning Authority outlining how the heritage value and history of the Site, in particular, South Ash Manor will be incorporated into the public realm and landscaping proposals.

Reason: To ensure community awareness, understanding and enjoyment of the heritage features of this site.

Car Parking

30. The car parking spaces shown on the approved plans shall be provided and retained only for the purposes of car parking in relation to the development hereby permitted and the wider golf course and site.

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

Ash Lane Access Restriction

31. There shall be no primary vehicular access from Ash Lane or South Ash Road to the Eastern Parcel hereby approved, except for emergency or general maintenance vehicles, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of highway safety.

Energy and Sustainability Strategy

32. The development shall be implemented in accordance with the approved Sustainability Statement and Net Zero Strategy (by Hodkinson October 2024) which seeks to achieve a reduction in CO2 emissions of 48% overall unless otherwise agreed in writing.

Reason: To ensure a reduction of carbon dioxide emissions and the highest levels of sustainable design and construction.

Approved Site Levels

33. The development hereby permitted shall be built at the levels specified on drawing LG635-TML-ZZ-ZZ-DR-L-1010-S2-P03 Site Wide Levels GA, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development does not harm the visual amenity of the locality.

Removal of Permitted Development Rights

34. 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), unless otherwise agreed with the Local Planning Authority.

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

Wheelchair Hotel Rooms

35. At least 5% of the hotel and lodge rooms within the approved development shall be designed as wheelchair accessible.

Reason: To ensure the development is accessible to wheelchair users.

Floodlight Requirements

36. The floodlights hereby approved shall not be used until they are fitted with automatic shut-off controls. Thereafter the automatic shut-off controls shall be retained unless agreed otherwise in writing by the Local Planning Authority.

Reason: In the interests of protecting surrounding residential amenity.

Infiltration of Surface Water Drainage

37. No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with Paragraph 180 of the National Planning Policy Framework.

8. Informatives

1. The development hereby permitted shall incorporate measures to minimise the risk of crime and accord to the principles and physical security requirements of Crime

Prevention through Environmental Design (CPTED). The incorporated measures shall be implemented before the development is occupied and thereafter retained.

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), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, if works may affect the public highway, including any highway-owned street furniture, the applicant is advised to engage with KCC Highways and Transportation at an early stage in the design process. 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, since failure to do so may result in enforcement action being taken by the Highway Authority.
5. Planning permission does not convey any approval for works within the highway for which you will be required to enter into a S. 278 Agreement under the Highways Act 1980 with KCC as local highway authority.
6. 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.
7. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed-on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
8. No furniture, fence, barrier or other structure may be erected on or across any Public Right of Way without the express consent of Kent County Council (KCC). There must also be no disturbance of the surface of the Public Right of Way, or obstruction of its use, either during or following any approved development without the express consent of KCC. The applicant should also be aware that any planning consent given confers no right to close or divert any Public Right of Way at any time without the express permission of KCC.
9. The approved tennis courts must adhere to the Lawn Tennis Association (LTA’s) design guidance for such facilities.

10. The applicant/developer is advised to refer to the comments and advice of KCC Flood and Water Management when preparing a detailed drainage design.
11. If any trees or shrubs need to be removed from the highway, as part of this approval, then contact will need to be made with Kent County Council's Arboriculture Team, via Contact Centre on 03000 418181, with details within the following link. There is likely to be charges imposed on any removal - Capital Asset Valuation for Amenity Trees (CAVAT). <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-highways-permit-or-licence/highways-fees#tab-12>
12. Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.
13. Any foul system discharging to ground in this area may require an environmental permit. If a permit is required, the applicant should submit sufficient information to the EA to show that a permit could be achieved for this design of foul drainage in this locality. Discharges are not normally allowed in an SPZ1 or direct to groundwater in areas of shallow water tables. The information required to submit a permit application is on the .gov website under Environmental Permits, discharges to ground.
14. The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:
 - excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
 - treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the EA
 - some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. It should be noted that re-use of historic landfill materials (including capping materials) is not covered under DoWCoP. The Environment Agency recommends that developers should refer to:

- the Position statement on the Definition of Waste: Development Industry Code of Practice and;
 - The Environmental regulations page on GOV.UK
15. Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2010
 - The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials – Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer will need to register with us as a hazardous waste producer.