

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

A report by Head of Planning Applications Group to Planning Applications Committee on 18 August 2009.

Application submitted by Kent County Council for the A2 Activity Park Scheme consisting of an outdoor Activity Park including car parking, pavilion and associated buildings, cycle tracks, footpaths, boundary treatments and landscaping on the A2 corridor and adjacent agricultural land at land between the new A2 and the redundant A2 Watling Street from the Pepper Hill Junction to the Marling Cross Junction, Gravesend - GR/09/440.

Recommendation: that subject to the resolution of the Highway Agency's concerns regarding the Holding Direction, PERMISSION BE GRANTED subject to conditions.

**Local Members:** Mr M. Snelling

**Classification:** Unrestricted

**Site**

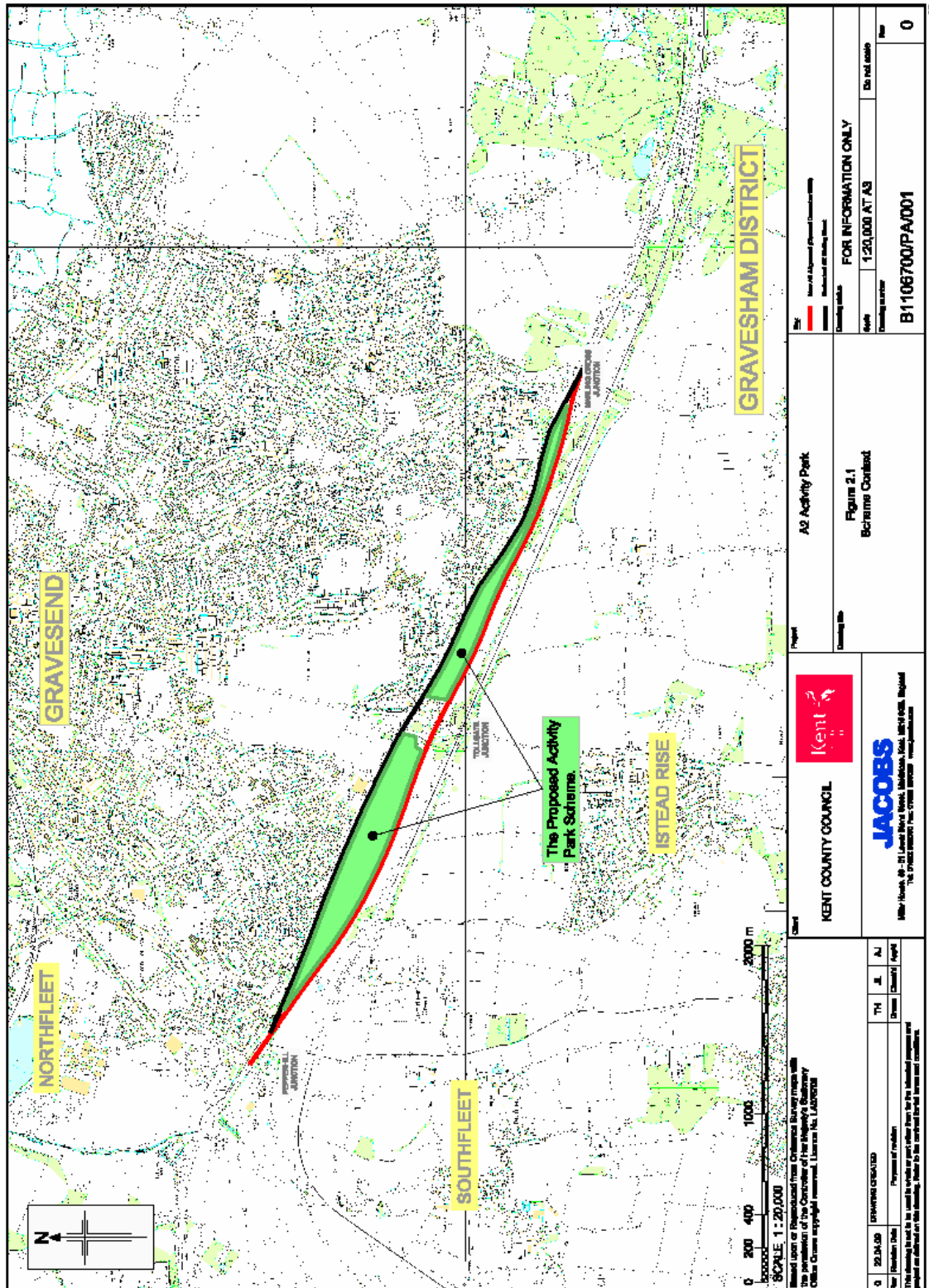
1. The recently completed A2 Widening Scheme between the Pepper Hill and Marling Cross junctions has created an open landscaped area of redundant carriageways and adjacent agricultural land which is now sandwiched between the southern edge of the residential areas of Gravesend and the new A2. This application proposes to develop this area of land, creating an Activity Park. The 46 ha linear application site lies between the A2 junctions of Pepperhill and Marling Cross, to the north of the new A2 carriageway and to the south of the urban edge of Gravesend town. The site is 5km long and at its widest, adjacent to Morrisons Supermarket, is 230m wide. The old redundant A2 carriageway runs parallel to the edge of the residential area of Gravesend and is included within the site boundary. The remainder of the site consists of newly landscaped open space and agricultural land, which is crossed with newly created paths and cycleways, and is open at all times to members of the public for recreational use. All of the site to the south of the old A2 carriageway is within the Metropolitan Green Belt. However, due to the nature of the development proposed, and the siting of built development upon the old A2 carriageway, this application has not been advertised as a Departure to Development Plan Policy. A site plan is attached.

**Background**

2. As a result of the Highway Agency's A2 improvement scheme, the former A2 carriageway has been converted into a combined cycle/footpath and a separate equestrian route with mounding and landscaping. The area remains in legal terms a highway, but without access for motor vehicles. Surplus spoil from the construction of the re-aligned A2 was used to create soil mounds and the new landscape has been planted with predominately native trees and shrubs, and is to be maintained to a country park type standard. As part of the Highway Agency proposals for the landscaping of the site, there was no inclusion of parking provision or amenity facilities. The application site comprises the areas that have recently been landscaped by the Highways Agency and two parcels of agricultural land enclosed by the new and old A2 corridors.

# Item D5

## A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440



**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**









**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**



**SHEET 5**

CUTLINE 5

CUTLINE 5

CUTLINE 4

CUTLINE 4

0 50 100 150 200 m  
SCALE 1 : 2000

- KEY**
- Major Existing Road
  - Major Proposed Road
  - Minor Existing Road
  - Minor Proposed Road
  - Footpath
  - Cycleway
  - Tree
  - Hedge
  - Boundary
  - Fenced Land
  - High Street Footpath
  - Proposed High Street Footpath
  - Proposed High Street Footpath (with kerb)

<p>Client: <b>KENT COUNTY COUNCIL</b></p> <p>Project: <b>A2 Activity Park</b></p> <p>Drawn by: <b>JACOBSON</b></p> <p>Project No: <b>B1106700PAJ018</b></p>	
<p>Issue: <b>1</b></p> <p>Date: <b>11/05/2020</b></p> <p>Drawn by: <b>JACOBSON</b></p> <p>Checked by: <b>JACOBSON</b></p>	<p>Project: <b>A2 Activity Park</b></p> <p>Drawn by: <b>JACOBSON</b></p> <p>Project No: <b>B1106700PAJ018</b></p> <p>Issue: <b>1</b></p> <p>Date: <b>11/05/2020</b></p>
<p>Project: <b>A2 Activity Park</b></p> <p>Drawn by: <b>JACOBSON</b></p> <p>Project No: <b>B1106700PAJ018</b></p> <p>Issue: <b>1</b></p> <p>Date: <b>11/05/2020</b></p>	
<p>Project: <b>A2 Activity Park</b></p> <p>Drawn by: <b>JACOBSON</b></p> <p>Project No: <b>B1106700PAJ018</b></p> <p>Issue: <b>1</b></p> <p>Date: <b>11/05/2020</b></p>	







A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440



Kent County Council

General Materials Schedule

- Roof** - Roof covering generally high quality, waterproof, covered panels (clay or asphalt depending on location) with a 20 year warranty. The roof to be laid on a waterproof membrane.
- Walls** - External walls to be constructed from brickwork to match the existing building. Internal walls to be constructed from brickwork to match the existing building. All walls to be finished with a high quality paint.
- Windows** - Windows to be constructed from high quality materials. Windows to be finished with a high quality paint.
- Doors** - Doors to be constructed from high quality materials. Doors to be finished with a high quality paint.
- External Cladding** - External cladding to be constructed from high quality materials. External cladding to be finished with a high quality paint.
- Roof** - At Pepper Hill Junction and Marling Cross Junction 11 Local Authority approval.



- Hygiene Area
- Equipment Area
- Traverse
- Children's Playground
- BBQ Area
- Office
- Workshop/Lean to Structure
- Food Store
- Facilities
- Changing Rooms
- WC
- Plant
- Roof

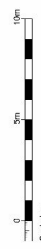
4/2019

Proposed North Elevation



- Access ramp
- Change Bar
- Children's Playground
- Changing Rooms
- WC
- Plant
- Roof & Structure
- Workshop/Lean to Structure
- Food Store
- Facilities
- Roof

Proposed West Entrance Elevation



Proposed A2 Pavilion, Gravesend

<p><b>Client</b> Kent County Council</p> <p><b>Project Name</b> Proposed A2 Pavilion, Gravesend</p> <p><b>Project No.</b> 11/10/2019/PA/029</p> <p><b>Scale</b> 1:50</p> <p><b>Date</b> 11/10/2019</p>	<p><b>Author</b> A. J. G. GARDNER</p> <p><b>Checked</b> A. J. G. GARDNER</p> <p><b>Drawn</b> A. J. G. GARDNER</p> <p><b>Project Manager</b> A. J. G. GARDNER</p> <p><b>Project Director</b> A. J. G. GARDNER</p> <p><b>Project Engineer</b> A. J. G. GARDNER</p> <p><b>Project Architect</b> A. J. G. GARDNER</p> <p><b>Project Designer</b> A. J. G. GARDNER</p> <p><b>Project Engineer</b> A. J. G. GARDNER</p> <p><b>Project Architect</b> A. J. G. GARDNER</p> <p><b>Project Designer</b> A. J. G. GARDNER</p>	<p><b>CIAGUE</b> CIVIL &amp; ELECTRICAL ENGINEERS</p> <p>11/10/2019/PA/029</p> <p>11/10/2019</p>
--	--	--

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

**Proposal**

3. This application has been submitted by Kent County Council and proposes to create an Activity Park through the provision of a 46 hectare high quality, traffic free, multi-use facility for cycle circuits, time trials, mountain bikes, BMX and skate boarding. The facility would provide dedicated facilities for local and national running and cycling, alongside informal walking, running and cycling and an equestrian route, all set within a landscaped and managed parkland accessible to the local community. The Activity Park would have two main functions but would be managed as a whole from a pavilion. Both functions would be served by the same access and parking arrangements. The two functions proposed are:
  - The core Activity Park: this would be located on the larger agricultural land parcel between Downs Road and the Tollgate Junction. It would be available to all members of the community and would operate to appeal to all ages and abilities. It would be a clearly defined fenced area with a pavilion building forming a part of the secure boundary line. The secure boundary of the site would enable activities in the core area of the park to be well managed.
  - A park with open access: The remainder of the Activity Park would be open to members of the community at all times and would include the footway/cycleway and associated landscaped area created by the Highways Agency that stretches from the Pepperhill Junction to the Marling Cross Junction. It would also include the areas of land sandwiched between the old and new A2 corridors to the east of the Tollgate Junction, and the parcel of agricultural land to the east of the Tollgate Hotel.
4. The key aspect of the core Activity Park would be the pavilion building with café/restaurant, youth drop in and meeting facility, gym, cycle hire storage, British Cycling training centre, workshops, multi use space for dance, education and music, and a reception area. The building design will be outlined in more detail below. However, it would have an outside terrace which would link with gardens/seating areas and would sit next to the tarmac track with trackside cycle preparation areas and a separate 'start building'. The pavilion area would lead to a series of functional spaces and to a pedestrian bridge which would cross the tarmac racing track enabling access to an 'external activity viewing hub'. The 'viewing hub' would look across the park with close proximity and integration to the BMX and skateboard performance and race areas.
5. The Core Activity Area tarmac track would be a 2.8km track, 6m wide on average, which would be broken down into four smaller tracks, all of which could function at the same time or as varied combinations. Mountain bike trails would run all over the Core Activity Park, segregated from the main track by basic underpasses. The tracks would be set in a landscape of grassland and tree and shrub planting, which would be in discrete large blocks ensuring there would be no conflict with biking activities but also that the planting would have the required wider landscape impact. The Core Activity Park would also provide a BMX track, free ride area, skate park, skills zones for mountain biking, down hill tracks, in line skating facilities, a Multi Use Games Area for informal outdoor sports and a play area designed for younger children.
6. The entire park, including the Core Activity Park, would be landscaped to a high standard, enhancing the extensive mounding and landscaping already undertaken by the Highways Agency. The aim is to create a structured, gently rolling green landscape with wooded areas and wild grasslands where spectators of events and members of the public would be free to roam and enjoy the formal and informal activities.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

7. The pavilion building would be sited to the west of the Tollgate Junction, immediately to the south of Morrisons supermarket. The applicant advises that the location has been selected so that the main built element of the scheme would be adjacent to commercial uses within the urban area, and also to contain the building within the footprint of the old A2 carriageway to avoid intrusion into the open area of Green Belt land to the south. The applicant also advises that the location would have the advantage of a direct relationship to the proposed main cycle track start/finish straight and the ability to link, via a bridge, to the 'central viewing hub'. The building would also be located in close proximity to the proposed car park, and would be linked to the main pedestrian/cycle route through the site by a paved forecourt area.
8. The pavilion building is conceived as a street, along which visitors would pass to gain access to the facilities both within the building and beyond. The building would be single storey but would vary in height from 3.15m to 5.7m depending on the size and use of the internal space. The south facing front of the pavilion would be mostly glass so as to take advantage of the views across the track to the wider expanse of the park beyond. The roof would be cantilevered out from the building above the large areas of glass so as to prevent the building from excessive solar heating. The building would measure 81.2m in length and 32.6m in width, designed as a simple but robust building to cater for heavy footfall and usage. A limited palette of materials is proposed including walls of slate blue brickwork, white/light grey render and natural timber boarding, grey aluminium framed windows and doors and aluminium/zinc and grey membrane roofing.
9. A small maintenance building and yard for grounds maintenance and storage of equipment would also be provided. It would be sited adjacent to existing vegetation and would be fenced. Planting is proposed to integrate it into the park with native species to match the existing. It would also provide a location for bike wash down for mountain bikes. The building would be single storey and 10mx8m in size.
10. It is proposed that a single dedicated point of vehicular access to the proposed facility is created. This access would be joined to the western side of the old A2 coast bound on-slip, which is currently used to access the Tollgate petrol station and residential properties, and forms the eastern arm of the A227 Wrotham Road/Coldharbour Road Roundabout. A priority junction would be constructed to join the access road to the old coast bound on-slip, with appropriate visibility splays. The access road would be 6m wide and would run westwards from the priority junction for approximately 200m, passing over the A227 Wrotham Road on the former A2 bridge, providing access to the main car park and pavilion.
11. The main car park would be sited to the east of the pavilion and would be approximately 200m in length and 40m wide. The entrance to the main car park would be gated, with opening hours restricted to the operating hours of the Core Activity Park and pavilion (see paragraph 12). The parking provision for the scheme also includes the construction of a small satellite car park at the eastern end of the scheme, accessed via Church Road. In total the main car park would provide 170 tarmac car parking spaces, of which 17 would be allocated as disabled spaces, 18 motorcycle parking spaces, 5 coach spaces and 80 cycle spaces. An overspill car park of 167 spaces would also be provided and a further 20 spaces would be provided in the satellite car park. The overspill car park would be located to the south of the tarmac car park, although only limited details are provided at this stage. Various existing access points for pedestrians and cyclists are located along the park's northern boundary, including controlled vehicular access points for service vehicles. Access points are located at the Pepper Hill Junction, Downs Road (accessed via Landseer Avenue), adjacent to the Tollgate Filling Station, Watling

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

Street, and on Hever Court Road, including an access adjacent to the Marling Cross Junction.

12. The main Activity Park would be open 24 hours a day all year round for general recreational and leisure uses. However, the Core Activity Park would only be open for use between the hours of 7.00am and 10.00pm. The pavilion building and associated car parking would be open from 7.00am until 11.00pm. The additional hour in the evening would allow club meetings or classes for various activities to take place, and would enable users of the outdoor areas to shower and clear the site safely.
13. The applicant confirms that entrance fees for the Activity Park would only be charged to those visitors using the facilities within the Core Activity Park, and that the café and social facilities of the wider park would be freely open to all. Car parking would also be subject to a charge, the details of which are yet to be finalised. However, at this time it is expected that there would be a short term 'free' period to accommodate local users/dog walkers. There would also be a high long term charge to deter long term parking by non park users, and admission charges to the Core Activity Park would include parking costs to avoid users parking on local road. The park would, however, be non profit making but ideally needs to be self maintaining.
14. The use of the site would be for predominately everyday recreational access and what the applicant terms a 'typical weekend event'. The applicant considers that a typical weekend event would occur approximately 40 times each year and would involve a 'non major event' being held on the cycle track or mountain bike track within the enclosed Core Activity Park, with average use of the other park facilities. It is anticipated that a 'typical weekend event' would attract approximately 424 visitors per day to the site, generating approximately 165 motor vehicle trips per day. In contrast, the applicant is also proposing to hold a limited number of 'major weekend events' at the site, which would involve mainly local, but sometimes regional, competitions. It is anticipated that a 'major weekend event' would attract approximately 1106 visitors per day to the site, generating approximately 455 motor vehicle trips per day.
15. It is not proposed to light the wider park outside of the Core Activity Area, however, the pavilion, car parks and access would be lit. Amenity lighting would be provided around the pavilion and along the link to the activity area and the car park to provide safe passage for users of the facilities. The BMX area and Skate Park, as well as other facilities within the Core Activity Park would require lighting, details of which have not yet been provided. However, the applicant advises that lighting would be designed to be appropriate for the facility/activity and would be in accordance with industry standards. All lighting would be of the flat glass variety to minimise light above the horizontal, thus avoiding light spillage and reducing the visual impact. This principle would also apply to the tarmac track, which as a training facility, would be treated as a standard road.

*This application was accompanied by a Planning and Environmental Assessment Report, a Design and Access Statement, Transport Assessment, Flood Risk Assessment, Cultural Heritage Desk Based Assessment, Public Exhibition Report, Market Analysis & Initial Business Case Report and Ecological Scoping Survey Report.*

*Copies of the submitted drawings showing the site layout, elevations of the pavilion, and access will be able to view on the day of the Planning Applications Committee Meeting in the Council Chamber.*

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

**Planning Policy**

16. The Development Plan Policies summarised below are relevant to the consideration of the application:

(i) The adopted **South East Plan**:

**Policy SP5** - The existing broad extent of Green Belts in the region is appropriate and will be retained and supported and the opportunity should be taken to improve their land-use management and access as part of initiatives to improve the rural urban fringe.

**Policy CC1** - The principle objective of the Plan is to achieve and maintain sustainable development in the region.

**Policy CC4** - The design and construction of all new development, and the redevelopment and refurbishment of existing building stock, will be expected to adopt and incorporate sustainable construction standards and techniques.

**Policy CC6** - Actions and decisions associated with the development and use of land will actively promote the creation of sustainable and distinctive communities.

**Policy CC8** – Local Authorities and partners will work together to plan, provide and manage connected and substantial networks of accessible multi-functional green space.

**Policy S1** - Local development documents should embrace preventative measures to address the causes of ill health by reflecting the role the planning system can play in developing and shaping healthy sustainable communities, including community access to amenities such as parks, open spaces, physical recreation activity and cultural facilities.

**Policy S5** - Increased and sustainable participation in sport and recreation should be encouraged.

**Policy NRM5** – Local Planning Authorities and other bodies shall avoid a net loss of biodiversity, and actively pursue opportunities to achieve a net gain in the region.

**Policy NRM9** – Strategies, plans, programmes and planning proposals should contribute to sustaining the current downward trend in air pollution in the region.

**Policy NRM10** – Measures to address and reduce noise will be developed at regional and local levels.

**Policy C4** - Outside nationally designated landscapes, positive and high quality management of the regions open countryside will be encouraged and supported by Local Authorities and other

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

organisations, agencies, land managers, the private sector and local communities, through a combination of planning policies, grant aid and other measures.

**Policy TSR2** - Opportunities to promote tourism and recreation-based rural diversification should be encouraged where they provide jobs for local residents and are of a scale and type appropriate to their location.

**Policy TSR3** – Opportunities will be sought to protect, upgrade and develop new regionally significant sports facilities.

**Policy W2** - Sustainable design, construction and demolition should be encouraged to minimise waste production.

**Policy KTG7** – In order to take forward the Thames Gateway Parklands aim of transforming the environment and image of the Gateway, provision should be made for green grid networks, recreation and public access, and enhancement of landscapes, habitat, heritage and the environment. Developments should be of the highest standards of design, and adopt best practice in the use of sustainable techniques.

**Policy LF9** – Local Development Documents will promote improved management to increase opportunities for access to the open countryside, the retention of attractive landscapes and enhancement of damaged ones, and conservation in areas of the rural-urban fringe easily accessible to people within the sub-region and beyond.

(ii) **Gravesham Local Plan First Review (adopted 1994):**

**Policy TC1** - The Borough Council will not normally permit proposals for new development which cause harm to interests of acknowledged importance. Applications will be considered in accordance with a number of design principles including the appropriateness of scale and massing, use of good quality materials, the design respecting the character and appearance of existing buildings, and safeguarding the amenity of neighbouring properties.

**Policy TC7** – On archaeological sites where permanent preservation is not warranted, applications will normally be refused unless arrangements have been made by the developer to ensure that time and resources are available to allow satisfactory archaeological investigation and recording to take place in advance of or during development.

**Policy TC10** -The Borough Council will normally require the submission of details of the landscaping proposed and will use its powers to ensure such landscaping is implemented.

**Policy GB2** - There will be a strong presumption against permitting new development in areas subject to Green Belt policies.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

**Policy C1** - Areas defined as 'Areas of Special Significance for Agriculture' will be subject to long term protection and Borough Councils will give priority to the needs of agriculture over other planning considerations.

**Policy LT1** – Suitable facilities for formal and informal recreation will be permitted at appropriate locations in the urban area and in the villages, having regard to an identified need for such facilities and subject to compliance with other policies of the Local Plan. Suitable facilities for informal recreation and formal outdoor recreation will be permitted in the Countryside where it can be demonstrated that this would be compatible with Green Belt and Countryside Conservation Policies.

**Policy LT8** - The Borough Council will aim to maintain and improve the existing public rights of way network and as opportunities arise, it will seek to provide new recreational footpaths, cycleways and bridleways in the Borough.

**Policy T1** - The Local Planning Authority will consider the impact on the transport system and on the environment of traffic generated by new development and would wish to ensure that all proposed developments are adequately served by the highway network.

**Policy P3** - The Borough Council will expect development to make provision for vehicle parking, in accordance with Kent County Council Vehicle Parking Standards.

(iii) **Gravesham Local Plan Second Review (deposit version 2000):**

**Policy T1** - In considering development proposals, the Local Planning Authority will consider the impact of the generated travel demand on the transport system as a whole, and on the environment.

**Policy T7** - The Borough Council will encourage the use of cycles as a means of travel for short and medium distance trips and for recreation.

**Policy T8-** The Borough Council will encourage the maintenance and enhancement of the network of footways, footpaths, bridleways and other public access routes throughout the urban and rural areas.

**Policy T16** - Provision will be made for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

**Policy NE6** - Development on sites containing or directly adjacent to trees or hedgerows of amenity, wildlife or landscape value will only be allowed if these landscape features are protected and retained in the long term. All new proposals for new development must incorporate new landscaping as an integral part of the scheme.



**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

- Policy NE7** - The Borough Council will encourage the implementation of wildlife enhancement initiatives and the planting of new landscaping in suitable locations to improve the ecological resource and the appearance of the environment.
- Policy NE14** – Development will only be allowed if it does not involve the loss of the best and most versatile agricultural land.
- Policy NE16** - Development likely to result in emissions to the air, by reasons of operational characteristics or the traffic generated by it, will require submission of details to enable a full assessment of the impacts on air quality to be carried out.
- Policy NE19** -Proposals for noise generating development will require a full assessment of the impact.
- Policy NE20** -Development involving the provision of external lighting will require the submission of details to demonstrate that the proposed lighting scheme is the minimum necessary for security, safety and working purposes, taking into account the design of the scheme.
- Policy BE1** - The Borough Council will give priority to conserving and enhancing the built environment in both the urban and rural areas.
- Policy BE10** - On archaeological sites where permanent preservation is not warranted, applications will normally be refused unless arrangements have been made by the developer to ensure that time and resources are available to allow satisfactory archaeological investigation and recording to take place in advance of or during development.
- Policy BE12** -A high standard of layout, design and materials will be expected for all new development. The Borough Council will not normally permit proposals for new developments which cause harm to the interests of acknowledged importance. Applications will be considered against a number of criteria.
- Policy RA2** - Within the Green Belt, inappropriate development will not be permitted.
- Policy LT9** - Land is safeguarded for new recreational or public open space use at – land between the A2 and CTRL south of Singlewell.
- Policy LT12**- Proposals to improve and extend the existing public rights of way network will be positively encouraged where they either provide a shorter or more convenient route, or improve access to the countryside.

**Consultations**

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

17. **Gravesham Borough Council:** raises NO OBJECTION to the principle of extending the existing linear park but raises the following concerns:-

- (1) the impact of the development as a whole on the openness of the Green Belt;
- (2) the lack of a clear justification for the location and scale of the development at this site and given the regional level of demand the absence of any analysis or assessment of other alternative locations for the development such as to give legitimacy to the proposals in a land use and planning policy context and in context and in particular why special circumstances exist for setting aside Green Belt policy;
- (3) that having regard to the scale of development within and adjoining the Green Belt that the development ought to be treated as a departure from Green Belt policy;
- (4) the proposals should not result in any detriment to the existing linear park cycle/footpath and bridleway and the benefits that have been gained as a result of the relocation of the A2, and that cycle routes leading to the linear park from surrounding areas be enhanced ;
- (5) that any more intensive use of the park beyond the current level of proposals would not be supported in either a land use or planning policy context;
- (6) the proposals will result in the loss of significant areas of best and most versatile land but there are a number of factors that weigh against their retention for continued agricultural use and as such would not justify an objection to the proposals solely for this reason;
- (7) there are concerns at the impact of the development in terms of noise, disturbance and lighting pollution. Whilst some of these matters can be addressed through planning conditions there are legitimate concerns at the extent of night time use and the proposed hours of use;
- (8) there are concerns at the impact from traffic both in terms of congestion and noise at major events that may be held and how this can be properly managed such as not to cause disturbance to local residents in the area;
- (9) there is a need for a full and robust security and maintenance strategy;
- (10) the richness of the archaeological resource in this locality will need to be fully investigated and recorded;
- (11) there is a need to reconsider the design and extent of the built form on the site both visually and in order not to impact on the existing linear park;
- (12) the materials for the car parking and access need to be reconsidered;
- (13) there is a need to consider how the impact of the security fencing can be reduced and softened.

Gravesham Borough Council also requests that in the event of Kent County Council resolving to grant planning permission that certain conditions are imposed to control/regulate the following broad issues:-

- (1) restriction on significant intensification of use of the park, controls on opening hours, and a limitation on night time activity;
- (2) restriction on the use of the building to prevent its use for functions/activities not related to the use of the activity park;
- (3) details of boundary treatment to be submitted for approval;
- (4) full lighting impact assessment to be submitted for approval;
- (5) no lighting of the existing linear park cycle/footpath or bridle path and no additional lighting to be added thereafter without approval;
- (6) contamination assessment in accordance with the Council's standard condition to be submitted for approval;
- (7) comprehensive construction code of practice covering all relevant environmental issues to be submitted for approval;

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

- (8) report to be submitted on noise levels for approval;
- (9) written assessment to be submitted if the proposals incorporate a wind turbine;
- (10) details of sustainability measures to be employed in the construction of the development to be submitted for approval;
- (11) agricultural soils to be protected during construction works;
- (12) park access maintenance and security strategy to be submitted for approval and to be implemented before the park is first operational and thereafter fully adhered to;
- (13) the detailed design and layout shall include measures for habitat creation and encouraging biodiversity and the construction activities shall provide full protection to existing habitats and flora;
- (14) archaeological mitigation strategy to be approved and watching brief to be undertaken during construction works;
- (15) full details of the design, materials and finishes of the pavilion building and maintenance building to be submitted for approval.
- (16) an enhancement strategy for cycle routes leading to the linear park from surrounding areas.

**Cobham Parish Council:** initially raised concerns regarding possible congestion on local rural roads, the design of the pavilion and light pollution. Following the submission of additional information from the applicant the Parish Council have no further comments to make.

**Southfleet Parish Council:** initially requested clarification over certain issues associated with the development including noise, waste & recycling, high attendance events, lighting and landscaping. Following the submission of additional information from the applicant no further comments have been received.

**The Divisional Transport Manager:** has no concerns regarding the everyday use of the facility and/or typical weekend event usage of the site. However, in order to assess the potential impacts of 'major' events further information such as a Major Event Travel Management and Parking Management Strategy', regional and national level survey information taken at a comparable site, an assessment of key junctions, survey work with regards to the cycle and highway network, and details of any works required as a result of these surveys, are required. This information cannot be provided at this time and, therefore, the Divisional Transport Manager is unable to assess the implications of 'major' events.

**The Highways Agency:** do not object to the Activity Park in principle, but have concerns over the high level of car parking proposed. In addition, the Highways Agency wish to discuss with Kent Highway Services what numbers of participants and visitors are envisaged to visit the site during typical and major events, and whether or how any restrictions on the holding of major events could and should be linked to restrictions on the numbers of participants. In light of these concerns the Highways Agency have issued a 'Holding Direction', which directs that planning permission not be granted for a specific period. The direction shall remain in place until the 23 September 2009.

*The applicant has submitted additional information to address the concerns of the Highways Agency, which was forwarded to the Agency for their information and comment. The County Planning Authority has yet to receive any feedback on this additional information and await further comments from the Highways Agency.*

**The County Council's Landscape Advisor:** concludes as follows:

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

“In landscape and visual terms the scheme is based on sound principles and these are clearly demonstrated in the text, however to fully appreciate and assess the proposals further information is required.

A review of the detailed design as the scheme progresses should be carried out, prior to construction, for the following aspects:

- Surfaces and Materials
- Lighting
- Earthworks and Contours
- Fencing and Gates
- Detailed layout, content and specification of track, play, games and recreation areas
- Bridge Construction
- Car Park layout and construction
- Planting design, species, densities and specification including establishment maintenance for all areas
- Management Plan for existing and proposed soft landscape areas
- Construction and arrangement of paths for pedestrians, bikes and horses
- Signage and furniture”

**The County Council’s Noise Advisor:** comments as follows:

“With regard to the typical weekend traffic I would not consider the addition of 165 vehicles per day to result in adverse impacts for residents fronting Wrotham Road.

In relation to traffic flows anticipated on “Worse Case Weekend Events” the Applicant considers a potential for 455 vehicles to enter the site in any one hour. The Applicant considers that this additional traffic on Wrotham Road would result in a no significant noise impact for nearby residential premises. I note that the noise predictions used to arrive at this conclusion compares the worse case traffic flow, anticipated to occur at the weekend, against a weekday peak hour flows on the local road network.

To truly consider the potential noise impact the worse traffic flow should be compared against a typical morning or evening weekend traffic flow, which is likely to be considerably lower than that during a peak hour weekday period. I would anticipate that such a comparison would conclude that a significant noise impact would occur for those nearby residents during that hourly weekend period, in excess of + 3dB  $L_{A10,1hr}$ . However, it is noted that this would occur a maximum of only three occasions per year. On this basis I would consider that these very occasional periods of elevated noise levels are not an overriding concern in terms of noise impact.

**The BMX and Skate Park**

The further information provided by the Applicant states that the detail of use for the BMX and Skate Park are still unknown. Although, given the number of anticipated visitors contained in the traffic flow numbers, I would consider it unlikely that crowd noise would result in adverse impacts.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

The applicant cannot confirm what if any public address or tannoy system may be used on site. Therefore, as recommended in my response of 24<sup>th</sup> June 2009 the Applicant has undertaken noise monitoring at a nearby sensitive premises, 30 Kemsley Close.

The measured noise data at 30 Kemsley Close shows that during day-time hours (07:00 to 23:00) at the weekend the average noise level was measured at 59.8  $L_{Aeq,T}$  with a minimum measured noise level of 55.0 dB  $L_{Aeq,T}$ . Therefore the measured noise levels show that the noise environment in this area is consistent throughout the day during weekend period. In light of the Applicant not being in a position to provide an assessment of any potential public address or tannoy system, I would recommend that the following condition be stipulated in order to control noise emanating from such activities:

*The noise level emanating from any public address system, tannoy system or speaker system shall not exceed 55 dB  $L_{Aeq,1hour}$  at the nearest residential premises. The measured noise level shall be undertaken under free-field conditions at 1.5m in height and the sound level meter shall be set to record in 'fast' mode."*

**The County Council's Dust/Odour Advisor:** concludes that users of the park are unlikely to experience a detriment in air quality as a result of the position of the scheme next to the A2. In addition, in terms of existing receptors, the scheme is unlikely to result in a detriment to the nearest residential receptors due to the relatively low numbers of vehicles expected to visit the park for the most part. Lastly, any potential dust generated during the construction phase could be controlled through appropriate conditions.

**The County Council's Lighting Advisor:** comments as follows:

"Lighting the existing combined footpath and cycleway on the north side of the development may lead to light spill affecting houses close to the boundary in Foxberry Walk, Rowmarsh Close, Templar Drive and Old Watling Street/Golf Links Avenue. In all cases the spill is likely to only affect the garden areas of the properties, not the houses or windows and is likely to have a minimal impact on the individuals involved.

The proposed lighting fittings would be located on the northern side of the footpath and either have the lamps recessed within the lanterns or be of a flat glass type such that the visual impact of the fittings would be minimal with virtually no sky glow or light spill. An optional 5 degree tilt upwards may also offer some help as the light spill would then be directed from the rear of the lantern at the lower angle, thus ensuring that there is little or no obtrusive light on the properties.

The design shows that the boundary foliage is sparse in the above areas, and consideration should be given to planting appropriate trees and shrubs to provide extra cover for the lighting.

With regard to lighting of the activities areas, the BMX and skateboarding areas would need to have good lighting in the vertical plane to avoid shadows and misrepresentation of the height and angle of objects. The light should be white or daylight coloured for optimum recognition of shapes, colours and surfaces, and have outer shields to cut out spill light and help in angling the beams. Care must be taken with this style of lighting so as not to cause

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

discomfort or disability glare in what can be dangerous sports. In addition, localised lighting may also be required in spectator areas for safe movement in hours of darkness, possibly in the form of low level lighting that would allow the illumination of the pathways without causing distraction to the riders.”

**The County Archaeologist:** has no concerns over the proposed development subject to conditions requiring the securing of the implementation of a programme of Archaeological work and the submission of foundation designs and any other proposals involving below ground excavation.

**The County Council’s Public Rights of Way Officer:** no comments received to date.

**The Environment Agency:** has no objection to the proposed development subject to the imposition of conditions regarding surface water drainage, foul drainage and land contamination.

**Natural England:** comment as follows:

“Natural England welcomes the proposal and is supportive of a scheme that provides open space and a valuable green buffer between the new A2 and the southern residential areas of Gravesend. The provision of a natural park area in conjunction with a planned Activity Park meets with our desire for the provision of multi-use green space as part of a green infrastructure policy. We are also encouraged by the improved cycle and equestrian links that will give better access to the wider countryside to the south across the A2.

Additionally, the scheme is in line with the aspirations of Ebbsfleet Valley and the A2 corridor Green Cluster Study and the Parklands Vision for the Thames Gateway, both of which are supported by Natural England.

The only area of concern we have is the proximity of the busy A2 to the proposed Activity Area. The purpose of the Activity Area is to promote aerobic exercise. It will be important, therefore, to ensure that air quality issues are carefully considered in the topography and design of the Activity Park so that there are no health issues to people who may regularly use the area.

The application also includes details of an ecological assessment and the likely impacts on protected species. In view of the current limited biodiversity interest on the site we have no major concerns.

The proposal should bring positive benefits to biodiversity with the planned woodland and grassland creation. “

**SEEDA:** considers that the project complements the objectives of the Kent and Medway ‘Greening the Gateway’ Partnership. SEEDA also considers that this proposal for a purpose built outdoor Activity Park would assist in building healthy and cohesive communities, an aim of the Parklands Programme included as part of the Thames Gateway Eco-Region prospectus.

**South East England Partnership Board:** no comments received too date.

**Sport England:** gives its support in principle to this planning application, and provides advice and guidance on the detailed/technical design of the sporting facilities proposed.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

**Police Architectural Liaison Officer:** no comments received to date.

**EDF Energy:** has no objection to the proposed works as long as their access rights to cables and equipment are maintained.

**National Grid:** provides advice and guidance on working in proximity to high pressure gas pipelines, underground electricity cables and overhead electricity lines.

**Union Railways:** has no objection to the proposal, but seeks to review construction methodology for activity at the west end of the proposed park.

**Local Member**

18. The local County Member, Mr M. Snelling, was notified of the application on the 22 May 2009. In addition the following former County Members of adjacent wards were notified of the application: Mr R. Parker, Mrs M. Newell, Mrs J. Cribbon, Mr L. Christie & Mr B. Bassam.

**Publicity**

19. The application was publicised by advertisement in a local newspaper, the posting of nine site notices and the individual notification of 289 nearby properties.

**Representations**

20. To date I have received 50 letters in support of the scheme and the provision of such cycling/sporting facilities from members of the public and cycling clubs/organisations. It should be noted, however, that many of these letters also expressed concern over an alternative use of the site, namely the provision of a football ground.

I have also received 12 letters of objection/concern and a petition signed by 19 residents of Kemsley Close, and a second petition signed by 76 local residents. The main comments/points of concern and objection can be summarised as follows:

Impact upon residential amenity:

- Residents have recently had the opportunity to enjoy a peaceful noise and pollution free environment, increasing the value of homes and the neighbourhood;
- An alternative site for such a facility, away from residential properties, should be found;
- The Activity Park would expose local properties to a substantial risk from a security perspective;
- The proposed development would have a negative impact on the amenity of local residents in terms of noise, light and 'visual' pollution;
- Car parks and increased vehicular use of the site would generate air pollution;
- Residents are concerned about noise pollution from the Core Activity Park;
- The park should be closed at dusk, removing the need to light the facility;

Design of the pavilion:

- The pavilion building is too close to residential properties;
- The building should be moved eastwards;
- The pavilion building is strongly opposed;
- The land should be left as open green recreational space;

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

- The pavilion is a huge building, which would be used for many events. It is too large for the rural Green Belt location;

**Access and parking:**

- The provision of an entrance to the Activity Park in Watling Street is already leading to additional car parking in the narrow road. The entrance is also in close proximity to a blind bend, a hot spot for accidents. This entrance should be removed;
- The application would attract tourists and visitors from far afield, increasing traffic, congestion and pollution;
- Local roads cannot accommodate an increase in traffic, and congestion could impede the passage of emergency services;
- Local roads will be used as car parks;
- Residents in Wrotham Road are concerned that their road has already turned into a lorry park;
- The proposed site access is unsuitable, and an alternative should be found;
- Car parking should be reasonably priced to encourage use of the facility, and to prevent car parking on local roads;
- Are there any proposals to improve cycle, pedestrian and public transport access to the site?
- There is no access provided for local residents between Morrisons Supermarket and Painters Ash School. A gateway should be provided to allow safe access for local residents;

**Other:**

- The site is currently being used illegally by quad/motorbikes due to a lack of security on site;
- Use by motorbikes, etc. not only causes noise and nuisance to local residents, but raises safety concerns for cyclists and walkers using the site;
- The tarmac paths/cycleways should be removed and the land planted with trees to stop nuisance use of the site;
- It is considered that the facility, particularly the pavilion, could become a burden to the rate payer;
- The site could become a target for vandalism and anti-social behaviour;
- The site is currently used by local people for walking and recreation, this proposal would totally ruin that;
- Payment to enter the Core Activity Park, and its location within an extensive fenced area, would not benefit the local community;
- Would the facility meet a local need or is a regional sports facility being provided at the expense of a local facility?
- The proposals would have a significant urbanising effect over a large area, and the fencing would create a feeling of enclosure rather than openness. The development would not preserve the openness of the Green Belt;
- The facility is a money making facility, not a rural park for local residents.

**Discussion**

21. In considering this proposal regard must be had to the Development Plan policies outlined in paragraph (16) above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. Issues of particular relevance include landscape and



**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

ecological impacts, access and car parking, design and siting of the pavilion and general amenity issues, including residential amenity. However, before these issues are discussed in detail, the siting of the development within the Metropolitan Green Belt must be considered and addressed. This application has not been advertised as a Departure from the Development Plan for the reasons detailed below.

**Green Belt**

22. As outlined in paragraph 1 of this report, all of the application site to the south of the old A2 carriageway is within the Metropolitan Green Belt. However, due to the nature of the development proposed, and the siting of the pavilion and car parking area upon the old A2 carriageway, the application is not, in my view, a departure from the Development Plan and has not therefore been advertised as a departure. The applicant discussed the implications of this development on the Green Belt within the submitted supporting documentation, and considered that the development constituted appropriate development within the Green Belt. For the reasons to be discussed below, the County Planning Authority also considered that the development would be an appropriate use within the context of Green Belt Policy and the guidance in PPG2 and, therefore, was not contrary to Development Plan Policies with regard to the Green Belt.
23. Appropriate uses within the Green Belt are well established through National Policy Guidance (PPG2) and case law. The Green Belts function is to preserve the openness of the Countryside and to prevent urban sprawl by maintaining separation between built up areas. However, as supported by Policy SP5 of the South East Plan, opportunity should be taken to improve the land use management and access to Green Belt land as part of initiatives to improve the rural/urban fringe. The Green Belt can, therefore, play a positive role in providing for increased access to the countryside for outdoor leisure and recreation. Uses should, however, also help to protect landscape and wildlife interest, keep land in agricultural and forestry use, and improve derelict or damaged land near towns.
24. There is a general presumption against inappropriate development within the Green Belt, and such development should not be approved except in very special circumstances. However, PPG2 lists a number of appropriate uses in the Green Belt, for which there is no presumption against development or a need to provide very special circumstances. One of the appropriate uses listed is *'essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it'*. PPG2 goes on to define 'essential facilities' as facilities which are genuinely required for uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it. Possible examples of such facilities include small changing rooms or unobtrusive spectator accommodation for outdoor sport/recreation.
25. The layout of the Activity Park has been carefully considered by the applicant to provide all the required facilities whilst meeting the fundamental aims of Green Belt policy, to maintain openness and prevent urban sprawl. The application site is a ribbon of land sandwiched between the new and old carriageways of the A2 and the Activity Park proposed would be a positive land use for the site. The site runs the full length of the southern urban edge of Gravesend and, therefore, its development as an Activity Park would protect the area from the future encroachment of the built up area. It would also act as a buffer to assist in safeguarding the countryside from encroachment and preserve the setting and character of Gravesend. The Activity Park as a whole would

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

- improve public access to the Green Belt site, providing an informal recreation facility, a use supported by Policy and Guidance.
26. The main areas of built development on site would be the pavilion building and car parking areas. However, these two elements of the Activity Park have been carefully sited on the old A2 corridor, outside of the Green Belt boundary. The siting of these elements of the scheme and their impact on local/residential amenity will be discussed later in this report. However, the principle of locating the pavilion and car parking outside of the Green Belt boundary and as close to existing built development as possible is supported in terms of preserving the openness and functioning of the Green Belt. However, the remainder of the Activity Park, including the Core Activity Park, would be located within the Green Belt.
27. I consider the principle of the Activity Park as a whole to be an appropriate land use within the Green Belt, as it would improve access to the rural/urban fringe by providing a facility for outdoor sport and recreation. By far the largest part of the site would be open to the public for everyday informal use, maintaining the openness of the Green Belt whilst providing a facility for outdoor sport and recreation. Therefore, I consider that the wider Activity Park is appropriate development within the Green Belt, as defined in PPG2. However, the impact of the Core Activity Park and some of the Activity Parks associated facilities need to be considered in terms of their appropriateness. The Core Activity Park would be fenced, details of which are yet to be provided, and would contain hard landscaped elements such as the BMX and skateboard areas, the main cycle tracks and a small Multi Use Games Area (MUGA). However, none of these areas would be covered, thereby maintaining the openness of the Green Belt. In addition, the design objective for the site would be to integrate these facilities into new and existing mounding and landscaping. The applicant also advises that fencing would be low key and is only required to maintain a safe operating environment. I consider that the fencing should be of an appropriate height, style and colour and that further details should be submitted pursuant to condition, should permission be granted. Subject to this, and the submission of a scheme of landscaping, I do not consider that the fencing of the Core Activity Park, and the hard surfaced elements of the proposal, would have a significantly detrimental impact on the openness or functioning of the Green Belt. Therefore, I consider that the Core Activity Park would fall within the definition of appropriate development, as outlined in PPG2, as it would preserve the openness of the Green Belt and would not conflict with the purpose of including land within the Green Belt.
28. However, some minor supporting buildings that are essential to the functioning of the Activity Park are proposed to be located within the Green Belt. A small scale 'start building' would be required adjacent to the cycle track, and a 10x8metre single storey maintenance building is proposed within the Core Activity Park. In addition, the overspill car park is proposed within the Green Belt, although this would be used only on a small number of occasions per year and would not be hard surfaced. Having accepted that the Activity Park is an appropriate use within the Green Belt, PPG2 states that essential facilities required for such land uses are also appropriate development. Examples given within PPG2 are small changing rooms or unobtrusive spectator accommodation. I consider that the provision of a 'start building' and a maintenance building would fall within the definition of essential facilities provided in PPG2, and are, therefore, also appropriate development within the Green Belt.
29. In summary, I consider the Activity Park as a whole to be an appropriate use within the Green Belt. The development would also accord with the general principles of relevant Development Plan Policies in that it would improve access to the Green Belt by providing a facility for outdoor leisure and recreation, whilst maintaining the openness of

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

the Green Belt and safeguarding the countryside from encroachment. Therefore, I do not consider this application to be a Departure from Development Plan Policy, and see no reason to refuse this development on Green Belt grounds.

**Landscape and ecology**

30. As outlined in paragraph 2 of this report, the former A2 has already been converted into a combined cycle/footpath and equestrian route, and surplus spoil from the re-alignment of the A2 has been used to create soil mounds and landscaping. The applicant advises that the site has been planted with predominately native trees and shrubs, and is to be maintained to a similar standard to a Country Park. However, the applicant concludes that existing vegetation is of generally low amenity value, particularly as the new planting by the Highway Agency is yet to have an impact having only been planted in November 2008. It is the applicant's intention, however, to retain as much existing planting as possible to provide some structure and interest in the relatively open landscape. New native tree and shrub planting is also proposed to provide structure and interest to the landscape, and provide an attractive setting for the pavilion and tracks. The planting strategy would use native shrub planting along the southern boundary to clearly define the line between the Activity Park and the A2. In many places, hedge or linear type planting would be used to maximise space and enhance the biodiversity value of the site. Open grassland would also be maintained. In the more open eastern areas this would contain a mix of mown informal amenity spaces and un-mown areas to encourage wildlife. In the Core Activity Park grassland would be maintained for conservation, being mown only once a year.
31. Existing planting along the northern boundary would be thinned and managed to improve quality, with new planting added to strengthen its effectiveness as both a visual and physical barrier between the park and adjacent properties. The applicant advises that the management approach would be tailored in individual areas to respond directly to local concerns and issues that have arisen through the applicant's local consultation. However, I consider that the new planting would be of significant benefit to the site and locality, as well as helping to absorb the new development into its surroundings. The County Council's Landscape Advisor does not raise objection to this application, but does require further details to be submitted pursuant to condition, should permission be granted. These details include details of hard surfaces, earthworks and contours, fencing & gates, and details of planting design, species, densities and a specification including a maintenance strategy. Should permission be granted, a detailed scheme of landscaping and tree planting would be required pursuant to condition which would incorporate all of the required information. Therefore, subject to conditions ensuring that trees to be retained are protected in accordance with BS5827: Trees in relation to construction and the submission of a detailed scheme of landscaping and tree planting, I see no reason to refuse this application on the grounds of tree related matters.
32. With regards to Biodiversity issues, an Ecological Scoping Survey Report was submitted with this application which indicates that further survey work for protected species is not required. Natural England is satisfied that the site has limited biodiversity interest and, therefore, has no concerns regarding the application, and concludes that the proposal should bring positive benefits to biodiversity with the planned woodland and grassland creation. However, should permission be granted, conditions would be imposed to ensure that the development is carried out in accordance with the recommendations of the submitted scoping survey, that nesting birds are not disturbed by construction activities and that the proposed ecological enhancements are incorporated into the scheme. Subject to the imposition of these conditions, I do not consider that the

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

proposed development would have a detrimental impact on the ecological value of the site and, in fact, could enhance biodiversity interests.

33. The application site and the Activity Park development also has a wider landscape value and importance. SEEDA considers that the project complements the objectives of the Kent and Medway 'Greening the Gateway' Partnership and that the development would assist in building healthy and cohesive communities, an aim of the Parklands Programme included as part of the Thames Gateway Eco-Region prospectus. These initiatives are supported by Local and South East Plan Policies including South East Plan Policy KTG7. In addition, Natural England welcomes the proposal and is supportive of a scheme that provides open space and a valuable green buffer between the new A2 and the southern residential areas of Gravesend. Natural England consider that the provision of a natural park area in conjunction with a planned Activity Park meets with their desire for the provision of multi-use green space as part of a green infrastructure policy. Additionally, the scheme is in line with the aspirations of Ebbsfleet Valley and the A2 corridor Green Cluster Study and the Parklands Vision for the Thames Gateway, both of which are supported by Natural England. The provision of public amenity space, the promotion of healthy life styles, recreation based rural diversification and access to the countryside are all principles promoted by South East Plan Policies, and would all be facilitated by the provision of the Activity Park.
34. As outlined earlier in this report, part of the application site is existing agricultural land. The proposals would result in a loss of this agricultural land, which Gravesham Borough Council regard as 'best and most versatile land'. However, I share the conclusion of the Borough Council in that there are a number of factors that weigh against the lands retention for continued agricultural use and, as such, would not justify an objection to the proposals solely for this reason.

**Access and Parking**

35. In general, access to the site is good as the Activity Park would be located on the edge of an urban area, in close proximity to the major road network. The facility would, therefore, be easily accessible to a large population by car, cycle, public transport and on foot. However, local residents have expressed concern over access, traffic, congestion and parking, and Kent Highway Services have concerns over the major events proposed at the site. In addition the Highways Agency have concerns over the high level of car parking proposed, and wish to undertake further discussions with Kent Highway Services with regards to the number of participants and visitors envisaged to visit the site, and whether or how any restrictions on the holding of major events should be linked to the number of participants.
36. First, I will address the issue of major events being held at the site, and will then move onto discuss general access and parking concerns associated with everyday typical usage of the site. As detailed in paragraph 14 of this report, the applicant is proposing to hold a limited number of 'major weekend events' at the site, which would involve mainly local, but sometimes regional, competitions. It is anticipated that a 'major weekend event' would attract approximately 1106 visitors (participants and spectators) to the site per day, generating approximately 455 motor vehicle trips per day. Although the applicant has submitted Transport Surveys and Assessments with this planning application, they relate to and assess the ability of the site, and the local highway network, to accommodate a 'typical weekend event'. In comparison to a 'major weekend event', and 'typical weekend event' is expected to generate 165 motor vehicle trips per day, attracting only 424 visitors per day.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

37. Kent Highway Services are unable to assess the suitability of the site and the local highway network to accommodate a 'major weekend event' due to a lack of survey work. Kent Highway Services have no concerns or objections over 'typical weekend events' and/or everyday use of the site. However, with regards to 'major weekend events' further information is required to enable a proper planning assessment. This includes a 'Major Event Travel Management and Parking Management Strategy', regional and national level survey information taken at a comparable site, an assessment of key junctions, survey work with regards to the cycle and highway network, and details of any works required as a result of these surveys. In addition, Kent Highway Services require discussions to be undertaken with Morrison's Supermarket with regard to the provision of a pedestrian access to the Activity Park from the adjacent Morrison's site. The applicant has advised that they cannot provide the required information at this time due to the need to undertake survey work at a newly opened similar facility, and then relate this to the A2 Activity Park site, assessing the ability of the local highway network to accommodate such an event. In light of this, the applicant and Kent Highway Services have agreed that 'major weekend events' should be considered as a separate planning application to be submitted in the future.
38. Therefore, I consider that, should permission be granted, a condition of any consent would ensure that no 'major weekend events' could be held at the site until such time as a separate planning application has been submitted to, and permitted by, the County Planning Authority. Any permission would limit the use of the site to the number of participants and spectators expected for a 'typical weekend event' with regards to cycling, so that no more than 100 participants and 50 spectators could use the Core Activity Park per day. This could be measured as use of the Core Activity Park would be subject to a charge. Therefore, only 'typical weekend events' and everyday use of the facility would be approved at this time should Members agree with the recommendation in paragraph 66 of this report. This approach should also appease the concerns of the Highways Agency with regards to major events, although Members will be updated on any further views received from the Agency on the day of the Planning Applications Committee Meeting.
39. Although Kent Highway Services has no concerns over the general use of the site and 'typical weekend events', local residents have expressed concern over the siting of the vehicular access, siting of various pedestrian accesses and the impact that the development could have on the local highway network. The Transport Assessment submitted with this application concludes that all the roundabouts on the local highway network are working well and will continue to do so in 2011 (the proposed opening year), with or without the traffic from the Activity Park. In light of this, it is considered that the impact of the development on the local road network would be minimal, a view supported in principle by a lack of objection from Kent Highway Services.
40. The applicant proposes a single dedicated point of vehicular access into the site, via the western side of the old A2 coast bound on-slip, which is currently used to access the Tollgate petrol station and residential properties. As outlined in paragraph 10 of this report, a priority junction with appropriate visibility splays would be created, which would be 6m wide and run westwards from the junction for approximately 200m, passing over the A227 Wrotham Road on the former A2 bridge, before joining the car park adjacent to the pavilion. Local residents have objected to the siting of this access, and suggest that an alternative be found. However, the applicant advises that prior to the Transport Assessment being undertaken a number of access options were explored and the access now proposed was considered to cause the least amount of congestion on the key local junctions. In addition, the proposed access works well operationally, requiring only a short access road to link the entrance to the car parking and pavilion, the location

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

of which is fairly inflexible due to the need to be outside of the Green Belt boundary and adjacent to existing commercial uses, in order to protect residential amenity. In light of this, and in the absence of any concerns from Kent Highway Services, I consider the proposed vehicular access to the site to be acceptable.

41. Local residents have also expressed concern with regards to users of the existing park parking on local roads, causing congestion and raising safety concerns. Various pedestrian access points currently exist along the northern site boundary and, due to a lack of parking on site, users of the existing park are parking in local roads to use these accesses. However, I am advised by the applicant that during the hours of operation of the Core Activity Park and the pavilion (discussed in more detail later in this report) all users, including walkers, cyclists and dog walkers would be able to use the main on-site car parking facilities, reducing the existing problems of visitors to the park parking in local residential streets. The satellite car park, which has 20 spaces, to be provided at the western end of Church Road, would also aid in reducing on street car parking. In addition, although the applicant is intending to charge for car parking, there would be a short term 'free' period to accommodate local users/dog walkers, again minimising the need for anyone to park on local roads. Therefore, I consider that the proposed development should ease existing parking problems on local residential streets as dedicated parking facilities would be provide in site.
42. The main car park would be sited to the east of the pavilion and would be approximately 200m in length and 40m wide. The entrance to the main car park would be gated, with opening hours restricted to the operating hours of the Core Activity Park, as discussed below. In total the main car park would provide 170 tarmac car parking spaces, of which 17 would be allocated as disabled spaces, 18 motorcycle parking spaces, 5 coach spaces and 80 cycle spaces. An overspill car park of 167 spaces would also be provided to the south of the main car park and a further 20 spaces would be provided in the satellite car park. Kent Highway Services are satisfied with the level of parking proposed, and consider that the site could accommodate vehicular traffic associated with everyday use of the Activity Park and 'typical weekend events'. The car parking has also been sited to be outside of the boundary of the Green Belt, and in close proximity to existing commercial development to minimise disturbance to local residents. Notwithstanding the concerns of the Highways Agency, in light of the views of Kent Highway Services, I have no concerns over the level of parking proposed and consider the siting of the car parking to be the most appropriate given the constraints of the site.

**Siting and design of the pavilion**

43. Local residents have expressed concern over the siting and design of the pavilion building, and consider the pavilion to be too close to residential properties and too large for the site's Green Belt location. As discussed earlier in this report, I am satisfied that the pavilion is outside of the boundary of the Metropolitan Green Belt, and that the development as a whole would not be contrary to Green Belt Planning Policy and Guidance. It is suggested that the pavilion building should be omitted from the scheme, although I am satisfied that a case of need for such a facility has been provided. The Core Activity Park could not function without a facility to allow participants to meet and prepare for events. The pavilion would also provide facilities such as a café/restaurant and general amenity spaces similar to those provided at County Parks across the County. The pavilion is a key aspect of the Activity Park as a whole, and is required to facilitate the successful management of the proposed development. However, the design and siting of the pavilion in terms of impact upon amenity needs to be considered.

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

44. The pavilion building would be sited to the west of the Tollgate Junction, immediately to the south of Morrison's supermarket. The applicant has carefully sited the built development to be outside of the Green Belt, but also to ensure that the pavilion and car parking associated with the Activity Park are adjacent to existing commercial uses within the urban area. As outlined in paragraph 7 of this report, the proposed siting of the pavilion also works well operationally, linked to the main pedestrian/cycle route through the site and located adjacent to the Core Activity Park, providing an entrance point and amenity area. The single storey building would vary in height from 3.15m to 5.7m depending on the size and use of the internal space, and would measure 81.2m in length and 32.6m in width. The building would be located over 120m from the closest residential property, and would be well screened by existing and proposed planting and landscaping. I consider that the applicant has carefully sited the pavilion within the site to work well operationally, whilst being outside of the Green Belt boundary and located adjacent to existing commercial uses. To move the building eastwards, as suggested, would affect the access and car parking arrangements, resulting in that being closer to residential properties to the east. Overall, I consider that the applicant has sited the pavilion building in the most suitable location on site and see no reason to refuse the application on these grounds.
45. The design of the pavilion has also been questioned, although I consider the single storey building to be appropriate in scale, and that the design would compliment the setting of the Activity Park. The applicant is proposing a limited palette of materials including walls of slate blue brickwork, white/grey render and natural timber boarding, grey aluminium framed windows and doors and aluminium/zinc and grey membrane roofing. In order to ensure that the materials are of a high quality I consider that details of external materials and finishes should be submitted pursuant to condition should permission be granted. In addition, to ensure a continuity of design across the site, I also consider that details of the design and material finishes of the ancillary buildings (start and maintenance building) should be submitted pursuant to planning condition, should permission be granted. Subject to these conditions, I do not consider that the design of the buildings on site would have a detrimental impact on the wider landscape or local amenity.
46. Although I consider the design and siting of the pavilion building to be acceptable, the impact of the use of the pavilion, and the Activity Park as a whole, needs to be addressed in terms of its impact upon residential amenity with regards to light, noise and air pollution, security and general amenity concerns.

**General amenity issues**

47. The wider Activity Park would be open and accessible to all 24 hours a day 7 days a week, as it currently is. It is, therefore, not reasonably possible to limit night time activity across the wider park. However, the pavilion, car parking and Core Activity Park would be subject to restricted hours of use. The applicant is proposing that the Core Activity Park would be open for use between 7.00am and 10.00pm, and that the pavilion building and associated car parking would be open from 7.00am until 11.00pm. The additional hour in the evening would allow club meetings or classes for various activities to take place, and would enable users of the outdoor areas to shower and clear the site safely. The hours of use are acceptable in principle, but will be discussed in more detail below in relation to various amenity issues.
48. For clarification, the applicant has confirmed that entrance fees for the Activity Park would only be charged to those visitors wishing to make use of the facilities within the

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

Core Activity Park. The café/restaurant and social facilities of the Activity Park would be freely open to all. In addition, for the avoidance of doubt, I can confirm that the application does not include the provision of a wind turbine.

Security

49. The existing use of the site, which is open at all times, has resulted in local residents becoming concerned over security and anti social behaviour. The site is being used illegally by motorcycles, which is a cause of disturbance to local residents and a health and safety risk to legitimate users of the existing facilities. Local residents are concerned that this application would exacerbate the existing problems, and increase security risks to adjacent properties. However, although the wider Activity Park would remain open at all times under this proposal, the applicant has taken steps to address these concerns, and confirms that motorised vehicles would not be able to use the facilities on site. The applicant has been made aware of local problems through their programme of consultation but is unable to fully address the situation at the moment as the land is controlled by the Highways Agency. However, the applicant has set up a specialist group, including Gravesham Borough Council CCTV security team, the local Police, KCC Country Parks Officers and representatives of the design team to monitor ongoing problems and refine a short and long term security strategy. As a result of this the applicant has already started investigating the use of a specialist security company, to be effective as soon as Kent County Council accepts control of the site. In addition to the above, increased legitimate activity at the Park should deter unauthorised use.
50. A fence would be erected around the perimeter of the Core Activity Park and the applicant advises that security staff would patrol the site regularly during times when the site is closed. CCTV cameras would also be installed at key locations throughout the Activity Park to deter unauthorised use, details of which would be required pursuant to condition should permission be granted. In addition, the pavilion building has been designed with careful consideration to 'Secure by Design' principles, which places an emphasis on the visibility of entrances, promoting a sense of ownership and ensuring continuous activity to deter the minority who may wish to be disruptive. Finally, the applicant has agreed to reinforce the existing boundary planting and close gaps in the boundary where necessary, details of which would be provided in the required landscaping scheme. In light of the information provided above, I do not consider that the proposed Activity Park would lead to an increase in anti social behaviour and, if anything, would deter the current illegal use of the facilities and improve the security of the site. I therefore see no reason to require further details with regards to security of the site to be submitted for consideration.

Noise

51. Local residents have expressed concern over the potential noise implications of the development with regards to increased traffic and increased use of the Activity Park itself. The applicant has provided additional information with regard to noise generated by the site, and has also confirmed that the existing landscape mounding would be retained in all areas, except where necessary to build the pavilion and car park, to ensure the best possible noise and visual mitigation.
52. The County Council's Noise Advisor has no concerns over the noise levels that would be generated by traffic associated with a 'typical weekend event' but did have some concerns over the noise implications of traffic associated with 'major weekend events'. However, due to the limited number of 'major weekend events' initially proposed the Noise Advisor was satisfied that these occasional periods of elevated noise were not an



**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

overriding concern. However, as discussed earlier in this report, 'major weekend events' are not recommended for approval as part of this application due to overriding concerns expressed by Kent Highway Services and, therefore, should an application for major events be submitted at a later date, further noise survey information should be included at that time to allow an accurate assessment of noise implications to be made. I have no concerns over the noise implications of traffic associated with typical use of the site and see no reason to refuse the application on these grounds.

53. However, use of the Activity Park itself could have implications with regards to noise generated by participants in events, spectators, and those using the site for informal recreation purposes. The County Council's Noise Advisor is satisfied that the anticipated number of visitors (participants and spectators) would not result in an adverse impact from crowd noise. This conclusion was drawn when also assessing 'major weekend events' so I am more than satisfied that 'typical weekend use' of the facility, and day to day recreational use, would not have a significantly detrimental impact on the amenity of neighbouring residents.
54. However, one possible cause of concern would be the use of public address or tannoy systems which, at this time, the applicant cannot confirm their use or otherwise. Although such systems would more than likely have been used in association with 'major weekend events', for the avoidance of doubt and in the interests of protecting the amenity of adjoining properties, I consider that a condition of consent should limit the noise levels emanating from any public address/tannoy system. The County Council's Noise Advisor has suggested the following condition, and I consider that this should form the basis of a condition of consent, should Members be minded to permit.

*The noise level emanating from any public address system, tannoy system or speaker system shall not exceed 55 dB  $L_{Aeq,1hour}$  at the nearest residential premises. The measured noise level shall be undertaken under free-field conditions at 1.5m in height and the sound level meter shall be set to record in 'fast' mode."*

#### External lighting

55. Very few details have been provided with regards to the external lighting of the Activity Park at this stage as the specific lighting designs cannot be finalised until the detailed design of some individual elements is complete e.g. the skatepark. Local residents have expressed concern over the impact that external lighting could have on their amenity, and the wider landscape. However, the site is sandwiched between the edge of the urban area and the new A2 corridor, both of which are lit. Therefore, I do not consider that lighting the facilities within the park would have a detrimental impact on the wider landscape as the surrounding area is already well lit at night. However, consideration must be given to the impact of lighting on the amenity of adjoining residential properties.
56. The applicant advises that lighting proposed for the Activity Park would be predominantly within the Core Activity Park and placed with careful consideration to local residents. As outlined in paragraph 15 of this report, the car park, access and pavilion would be lit and amenity lighting would be provided between the pavilion and the car park for the safety of the users of the facilities. The BMX area and skatepark, as well as other facilities within the Core Activity Park, would require lighting, details of which are yet to be provided. The applicant advises that lighting would be installed to meet the needs of the individual facilities only and certainly not designed to cover the whole park. All lighting, except that necessary for security, would be turned off at 10pm. In light of this, I consider that if permission is granted it would be appropriate to reserve details by

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

condition so that the type and position of any external lighting can be controlled to ensure any potential nuisance from light pollution can be minimised. In addition, a further condition of consent would require all lighting, apart from that associated with security, to be extinguished by 10pm, or 15 minutes after the last use of the facility should that be earlier. Lastly, the Borough Council request that the existing parks cycle/footpath and bridle way are not lit unless express permission is sought. Should permission be granted, this would form a condition of consent. Subject to these conditions, I do not consider that external lighting would have a significantly detrimental impact on the amenity of adjoining residents.

Air Pollution

57. Local residents have expressed concern over the potential increase in air pollution generated by the additional vehicular traffic that the Activity Park would attract. In addition, Natural England consider it important to ensure that air quality issues are carefully considered in the design of the Activity Park to ensure that there would be no health implications as a result of undertaking aerobic exercise next to the A2. The applicant has confirmed that the actual tracks are some distance from the A2 and that pollutant concentrations tend towards background levels at this distance. The County Council's Dust/Odour Advisor concludes that users of the park are unlikely to experience a detriment in air quality as a result of the location of the Activity Park and, therefore, are satisfied that users of the facility would not be subject to health risks. With regards to existing residents/receptors, the County Council's Advisor considers it unlikely that the scheme would result in a detriment in air quality due to the relatively low numbers of vehicles expected to visit the park for the most part. Therefore, I am satisfied that the development would not increase air pollution in the vicinity due to increased vehicular traffic, and that users of the facility would not be subject to high levels of pollutants due to the sites proximity to the A2.

Hours of use

58. In light of the above, I consider the proposed hours of use, as detailed in paragraph 47, to be acceptable, subject to the conditions outlined above and the extinguishing of external lighting at 10.00pm. I do not consider that the proposed hours of use would have an unacceptable impact on the amenity of neighbouring residents.

**Archaeology**

59. A 'Cultural Heritage Desk Based Assessment' accompanied this planning application, and additional information has been provided by the applicant throughout the determination process to address queries raised by the County Archaeologist. The County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, conditions of consent should be imposed. It is requested that no development takes place until the applicant has secured the implementation of a programme of archaeological work, and has submitted details of foundation designs and any other proposals involving below grounds excavations. Therefore, subject to the imposition of the required conditions, I do not consider that this proposal would have a detrimental impact on archaeological remains.

**Drainage and Land Contamination**

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

60. The Environment Agency raises no objection to this application subject to the imposition of conditions regarding surface water drainage, foul drainage and land contamination. Gravesham Borough Council has also requested the imposition of a condition regarding the submission of further survey work concerning land contamination. Therefore, I consider that subject to the imposition of a condition requiring the submission of a scheme to deal with the risks associated with contamination of the site prior to the commencement of the development, the development could be controlled to ensure that it would not result in unacceptable pollution levels. In addition, at the request of the Environment Agency, should permission be granted a condition would be imposed to ensure that no infiltration of surface water drainage into the ground be permitted other than with the express consent of the County Planning Authority. Again, this would ensure that the development would not result in an unacceptable level of pollution, in accordance with the principles of Development Plan Policy.

**Construction**

61. Given that there are neighbouring residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of construction and works on site in order to protect residential amenity. I would suggest that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays. In addition, should permission be granted details of a 'construction code of practice' would be required pursuant condition, which should include details of measures to ensure that dust, noise, mud on the local highway network, and other matters associated with construction, would be mitigated as far as reasonably possible so as to minimise disruption to local residents. Details of construction methodology should also be included within the code of practice.

**Need/alternative sites**

62. Local residents have questioned the need for the proposed Activity Park, and suggest that it could be a commercial venture rather than a facility for local use. The applicant advises that the initiative for the Activity Park has never been as a result of any short term interest in cycling/skateboarding etc. due to the Olympics, and that there is a genuine requirement in the area for an activity based facility. The letters of support received during the determination of this application from cycling clubs and individuals demonstrate a real need and want for a dedicated cycling facility of this nature. The applicant states that support for the park is borne out of genuine local support from specialist cycle and sports clubs, and from the general youth and community service sectors. It is also important that the existing park finds a mechanism whereby it can support and justify itself and the security strategy that goes with it.
63. The applicant has also confirmed that this planning application does not, and has never, included proposals for a football stadium. The applicant states that they are not associated with any negotiations with Ebbsfleet United and do not feel that inclusion of football facilities would be in keeping with the vision for the Activity Park, or the ability to comply with Green Belt Policy.

**Conclusion**

64. This proposal has given rise to a variety of issues, including the appropriateness of the development within the Green Belt, the impact of the proposed development on the openness of the Green Belt and the wider landscape, highway and access implications and general amenity issues. However, I consider that the development constitutes

**A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

appropriate development within the Green Belt, as defined in PPG2, and that the Activity Park and its associated facilities would not have a significantly detrimental impact on the openness of the Green Belt. I do not consider that the development would conflict with Green Belt Policy and/or the functioning of the Green Belt. On balance, therefore, subject to the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm and is otherwise in accordance with the general principles of the relevant Development Plan Policies. Therefore, I recommend that permission be granted subject to appropriate conditions.

65. In light of the current economic climate, and the complexity of the development, I consider it appropriate in this instance to allow the applicant 5 years within which to implement the development, in lieu of the usual 3 year time frame.

**Recommendation**

66. I RECOMMEND that subject to the resolution of the Highway Agency's concerns with regards to the Holding Direction, that PERMISSION BE GRANTED SUBJECT to conditions, covering:
- A 5 year time limit for implementation;
  - the development to be carried out in accordance with the permitted details;
  - no 'major weekend events' to be held on site until such time as an application for such events is submitted to and permitted by the County Planning Authority;
  - the submission of details of all materials to be used externally for the pavilion and ancillary buildings, and design details of the ancillary buildings;
  - details of all external lighting including security lighting, lighting of the pavilion and car park, and lighting of the facilities within the Core Activity Park;
  - no lighting of the existing parks cycle/footpath or bridle way without approval;
  - all lighting on site, except security lighting, to be extinguished by 10pm, or 15 minutes after last use of the facility if earlier;
  - details of CCTV;
  - a scheme of hard and soft landscaping, its implementation and maintenance, and details of earth works and land contours;
  - measures to protect trees to be retained;
  - details of fencing, gates and means of enclosure, including colour finishes;
  - contaminated land assessment;
  - control of surface water drainage;
  - limit on noise levels from public address/tannoy systems;
  - details of foundation design/below ground excavations;
  - implementation of a programme of archaeological work;
  - development to accord with the recommendations made in the submitted Ecological Scoping Survey;
  - protection of nesting birds;
  - identified ecological enhancements to be incorporated into the scheme;
  - the provision of car parking and access prior to occupation;
  - the provision of overflow parking, should in be required;
  - restrictions on hours of use of the Core Activity Park, and the pavilion and car park;
  - hours of working during construction;
  - construction code of practice to include measures to prevent dust etc during construction, prevention of the deposition of mud on the local highway network and details of construction methodology.

## **Item D5**

### **A2 Activity park Scheme from the Pepper Hill Junction to the Marling Cross Junction, Gravesend – GR/09/440**

---

Background documents - See section heading