

- a) **DOV/16/00924 - Erection of a green-keeper's maintenance building incorporating toilet and rest-room and the construction of a wash-down facility, associated hardstanding and landscaping - Walmer and Kingsdown Golf Club, The Leas, Kingsdown**

Reason for report: The number of contrary views.

- b) **Summary of Recommendation**

Refuse Planning Permission

- c) **Statutory Requirements, Planning Policies and Guidance**

Statute

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy Framework (NPPF) 2012

Paragraph 6: recognises that the purpose of the planning system is to contribute to the achievement of sustainable development.

Paragraph 7: outlines the three dimensions of sustainable development, which has an economic role, social and environmental role.

Paragraph 14: states that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

Paragraph 28: outlines how planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.

Paragraph 56: emphasises that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Paragraph 109: The planning system should contribute to and enhance the natural and local environment.

Paragraph 114: states that local planning authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as heritage coast, and improve public access to and enjoyment of the coast.

Paragraph 115: great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.

Paragraph 118: outlines the principles that the LPA must follow when determining planning applications and the subsequent impact on biodiversity.

Dover Core Strategy (2010)

Policy CP1 (Settlement Hierarchy) The location and scale of development in the District must comply with the Settlement Hierarchy.

Policy SP7 (Green Infrastructure Network) The integrity of the existing network of green infrastructure will be protected and enhanced through the lifetime of the Core Strategy.

Policy DM1 (Settlement Boundaries) Development will not be permitted on land outside the urban boundaries and rural settlement confines shown on the proposals map unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.

Policy DM3 (Commercial Rural Buildings) states that permission for new commercial development or the expansion of an existing business in the rural area will be given provided that certain criteria are met.

Policy DM11 (Managing Travel Demand) Development that would generate travel will not be permitted outside the urban boundaries and rural settlement confines unless justified by development plan policies.

DM15 (Protection of the Countryside) Development which would result in the loss of, or adversely affect the character and appearance of the countryside will not normally be permitted.

DM16 (Landscape Character) Development that would harm the character of the landscape will only be permitted if it is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures or it can be sited to avoid or reduce harm and incorporate design measures to mitigate impacts to an acceptable level.

Local Plan Saved Policies (2002)

Policy C05 (Undeveloped Heritage Coast) Development will only be permitted under very specific circumstances. Development will not be permitted if it would adversely affect the scenic beauty, heritage or nature conservation value of a Heritage Coast or the undeveloped Coast.

Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019

Policy LLC1 The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.

Policy LLC6 The improved awareness and appreciation of all the special qualities of the AONB landscape and its conservation to people who influence the future of, live, work in or visit the AONB will be pursued

Policy BD1: The maintenance and enhancement of existing designated sites and priority habitats, their extension and connection, will be pursued through sensitive management, fragmentation reduction and restoration.

Policy BD5: The protection, conservation and extension of Kent Downs's priority and distinctive habitats and species will be supported through the Local Plan process,

development management decisions and the promotion of the Biodiversity Duty of Regard (NERC Act 2006).

Supplementary Planning Documents and Guidance

The Kent Design Guide

Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019

d) Relevant Planning History

An application was submitted in 2015 seeking full planning permission for the erection of a green keeper maintenance building incorporating toilet and rest room and the construction of a wash down facility, associated hardstanding and landscaping (ref: 15/00491). The Council refused the application for the following reason:

1. *The proposals, by virtue of the scale, form, siting, location and appearance in the Kent Downs AONB and Heritage Coast and its close proximity to the Dover to Kingsdown Cliffs SAC and the Dover to Kingsdown Cliffs SSSI, would introduce an inappropriate, intrusive and harmful form of development into a part of the district that is renowned for its natural beauty and character, which would cause adverse effects to designated ecological sites of international importance, thereby being contrary to Dover District Local Plan policy CO5, Core Strategy policies DM15 and DM16, the aims and objectives to NPPF paragraphs 17, 56, 64, 109, 114, 115 and 118, in particular and policies LLC1 and LLC6 of the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019.*

An appeal was then lodged by the applicant. The inspector dismissed the appeal and upheld the Council's decision to refuse planning permission.

Further planning history relevant to this application is listed below:

- DOV/96/00969; Erection of a greenkeepers store. Refused.
- DOV/97/00965- Erection of a greenkeepers store, associated hard landscaping and alteration to vehicular access. Refused.
- DOV/98/00137- Extension to existing greenkeepers storage and maintenance store. Refused.
- DOV/98/00775- Erection of storage building to accommodate twelve golf buggies. Granted.
- DOV/98/01157- Erection of greenkeepers store and creation of vehicular access. Granted on Appeal.

e) Statutory Consultee and Third Party Comments

DDC Landscape and Ecology were consulted and said the application should be refused on biodiversity and landscape impact grounds. The comments also state that the proposal would not preserve or enhance the AONB and that a Landscape Visual Impact Assessment (LVIA) should be carried out to test the various receptors effected by the development.

Natural England were consulted and referred the LPA to the comments made on the previous application (15/00491/FULL). These comments stated that further information was required in order for the Local Planning Authority to determine whether or not the proposal would have a significant effect on any European Site and Site of Scientific Interest. They recommend that the following information is obtained.

- i. *Chemicals/oils likely to be used and stored at the proposed maintenance building for vehicle maintenance and washing; and*
- ii. *What drainage and other safeguards will be in place such that foul water and contaminants do not reach the nearby designated sites.*

Natural England advise that the applicant does not appear to have addressed these concerns.

Ringwould with Kingsdown Parish Council were consulted and object to the application for a number of. The main concerns raised were over the impact of the development on the AONB, wildlife and landscape. Not only this, the Parish suggested the applicant has more useful land at their disposal which might be more suitable.

KCC Archaeology were consulted and stated that given the sites potential to yield archaeological remains, a pre-commencement condition should be imposed requiring a programme of archaeological work.

KCC Public Rights of Way had no comments to make on the application.

The Kent Wildlife Trust were consulted but did not make any comments on the application.

Third Part Representations

A total of 18 third party representations were received in response to this application. 11 of these object to the application, whilst 7 support it.

The main concerns raised in the letters of objection are summarised below:

- the impact of the development on the AONB;
- impact on neighbouring amenities;
- impact on the environment and wildlife;
- more suitable sites could be used.

The majority of the commentators who objected to the proposed recognised the need for the golf club to upgrade their facilities.

Those who support the application, do so for the following reasons:

- facilities were in need of updating to adhere to health and safety standards;
- Requirement for a modern golf course;
- Visual impact/ harm will be minimal and could be mitigated.

f) The Site and the Proposal

The Site

1. The application site comprises an area of land (approximately 760 square metres), situated within the grounds of Walmer and Kingsdown Golf Club to the south west of the southern end of Granville Road.
2. There are a cluster of residential dwellings accessed via Granville Road which are visible from the application site, including Kentbridge Lodge and Hope Point Lodge, located roughly 50 metres to the east of the application site.

3. The site is situated in the Kent Downs Area of Outstanding Natural Beauty and Undeveloped Heritage Coast, situated roughly 380 metres west of the Kingsdown to Dover Special Area of Conservation and SSSI. The Golf Course is also a Local Wildlife Site (DO31), designated for its chalk (calcareous) grassland.

The Proposal

4. This application seeks full planning permission to erect a greenkeepers maintenance building within the grounds of Walmer and Kingsdown Golf Course. The building will incorporate a toilet, wash-down facility and associated soft and hard landscaping.
5. The building would be agro-industrial in its appearance, with roof lights and roller doors circa 2.5 metres tall. The building would be a maximum of 5 metres at its highest point, stepping down incrementally to 4.6 metres and then to 4.1 metres. The proposed building would be 24.2 metres wide and 14.5 metres deep, which equates to a built footprint of 350.9 square metres.
6. Around the building an area of hardstanding is proposed, adjacent to which lies a wash-down facility with a drainage system into an underground treatment plant. The total area of hard landscaping proposed is 408.4 square metres.

Background Information:

7. A planning application was submitted in 2015 (15/00491) which also sought consent for the erection of a greenkeepers maintenance building and wash-down facilities. Planning permission was refused in 2015 and an appeal dismissed.
8. The applicant has submitted this application with the intention of addressing the inspectors concerns, which are outlined within the appeal decision. The inspector's decision has been a material consideration in determining this planning application.

Main Issues

9. The main issues in the determination of this application are:
 - Principle of the Development;
 - Design of proposed maintenance building;
 - Impact on the character and appearance of the AONB and Undeveloped Heritage Coast;
 - Residential amenity;
 - Ecology and biodiversity;
 - Archaeology;
 - Highway Impact;
 - Other Matters.

Assessment

Principle of Development

10. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
11. The NPPF states that any development that accords with an up-to-date development plan should be approved and that which conflicts should be refused unless material

considerations indicate otherwise. At the heart of the NPPF is a presumption in favour of sustainable development and for decision making this means approving development that accords with the Development Plan.

12. Policy DM1 of the Core Strategy states that development will not be permitted on land outside the urban boundaries and rural settlement confines shown on the proposals map unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.
13. Moreover, paragraph 28 of the NPPF outlines how planning policies should support a strong rural economy, local and neighbourhood plans should support the sustainable growth and expansion of all types of business and enterprise. Policy DM3 of the Core Strategy states that permission for new commercial development or the expansion of an existing business in the rural area will be generally be granted. In all cases development should be within rural settlement confines unless it can be demonstrated that no suitable site exists, in which event it should be located adjacent to the settlement unless there is a functional requirement for it to be located elsewhere.
14. The application site is located outside of any defined settlements boundaries, however the propose development is for a green keepers maintenance building which will operate ancillary to the main use of the golf course. Therefore, it is considered that the development proposed functionally requires its location and is ancillary to an existing use.
15. In light of the above, it is considered that providing a greenkeepers maintenance building would support the rural community and economy because it is necessary to ensure continued success of the golf course. This was supported by the inspector within his appeal decision who states "*the facilities proposed are more appropriate to the needs of the Club, and would address health, safety and welfare concerns, as well as providing up-to-date accommodation to further the aims of economic development in the area.*" Further to this, the proposed buildings location- outside of the defined settlement boundaries- is justified by its functional requirement to be within the grounds of the golf course.
16. The principle of development is therefore considered acceptable, with planning permission subject to the consideration of other relevant development plan policies and material considerations.

Design of Proposed Maintenance Building

17. Paragraph 17 states that the need to always secure high-quality design should underpin decision-taking. Likewise, paragraph 56 refers to good design being a key aspect of sustainable development, indivisible from good planning, and should contribute positively to making places better for people.
18. The design of the proposed maintenance building needs to achieve a delicate balance between functionality and visual impact. For example, the building must be fit for purpose in terms of its size and the facilities it includes, however at the same time needs to be aesthetically pleasing in order to minimise the visual impact on the Kent Downs AONB and Undeveloped Heritage Coast.

19. The proposed maintenance building is quite a large structure being up to 5 metres in height, 24.2 metres wide and 14.5 metres deep (350.9 square metre footprint). When added to the proposed area of hardstanding, the development comprises an area of roughly 760 square metres.
20. The applicant has sought to minimise the buildings size and prominence, at least to some extent with proposed excavation works, which would sink the building into the landscape. However it is also noted that these excavation works are also required to ensure that building can be erected on a flat surface.
21. The front elevation would be clad with vertically emphasised timber cladding, giving the impression that the building forms part of the landscape, particularly as it would be sunk into the ground by some 2 metres.
22. The building would have a maximum ridge height of 5 metres, decreasing incrementally from the top left corner of the front elevation to the top right corner where the height is approximately 4 metres. The building would have a pitched roof with a staggered height, and be fitted with roof lights to ensure the building benefits from good natural light.
23. The design of the maintenance building has evolved since the application was first submitted in August 2016, and officers now consider the revised design approach and proposed landscaping scheme presents an improved solution that balances functionality with aesthetics.
24. However, the size of the building means and its exposed location means that it will appear dominant in the landscape and result in visual harm, which cannot be fully mitigated by good design.
25. The impact of the proposed building on the character and appearance of the countryside, AONB and undeveloped heritage coast is discussed in the next section of this report.

Impact on the character and appearance of the AONB and undeveloped heritage coast

26. Policy DM15 states that development which would result in the loss of, or adversely affect the character or appearance, of the countryside will only be permitted if it is:
 - i. *In accordance with allocations made in Development Plan Documents, or*
 - ii. *justified by the needs of agriculture; or*
 - iii. *justified by a need to sustain the rural economy or a rural community;*
 - iv. *it cannot be accommodated elsewhere; and*
 - v. *it does not result in the loss of ecological habitats.*

Provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character.

27. Walmer and Kingsdown Golf Course is a rural business and it is considered that the continued success is central to sustaining part of the local rural economy and the rural community who will use the golf courses facilities in their leisure time. The need for and importance of the proposed facility is set out by the inspector who states that *“the facilities proposed are more appropriate to the needs of the Club, and would*

address health, safety and welfare concerns, as well as providing up-to-date accommodation to further the aims of economic development in the area.”

28. However the inspector goes on to state that these aims could be addressed with a *“building that is more appropriate to its surroundings and possibly in a more appropriate location.”* The building proposed would occupy a very exposed and open part of the golf course appear as quite prominent within the landscape.
29. Therefore whilst the maintenance building does functionally require a location within the boundaries of the golf course, there is a strong case that it could be accommodated elsewhere. No evidence has been submitted by the applicant to suggest that no other suitable sites have been explored. It could be that a replacement building could be located in the position of the existing storage/maintenance building.
30. Policy DM15 also states that for development to be acceptable in the countryside it must not result in the loss of ecological habitats. As will be discussed later in this report, the proposed maintenance building, by virtue of its location would result in a loss of important ecological habitats.
31. For the reasons outlined above, it is not considered that the proposed development meets the requirements of policy DM15.
32. Paragraph 115 of the NPPF states that when determining planning applications great weight should be given to conserving should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. Likewise, paragraph 114 requires identifies that it is vital for local planning authorities to maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as heritage coast.
33. Policy DM16 outlined how development that would harm the character of the landscape will only be permitted if:
 - i. *It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*
 - ii. *It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.*
34. Saved Local Plan Policy CO5 states that development will only be permitted on the undeveloped heritage coast, if:-
 - i. A coastal location is essential and no suitable site exists
 - ii. The development is not in an area of eroding cliffs or unstable land;
 - iii. It would not result in the need for coastal protection works; and
 - iv. There is no adverse off-shore impact.
35. Additionally, on the heritage coasts, development will not be permitted if it would adversely affect the scenic beauty, heritage or nature conservation value of a heritage coast or undeveloped coast.

36. The application site falls within the Kent Downs Area of Outstanding Natural Beauty (AONB) and an area of undeveloped heritage coast, and therefore Core Strategy Policy DM16 and saved local plan policy CO5 apply:

37. The Councils landscape officer makes the following comments and observations:

“Given that the proposal is within the AONB, it is of concern that no landscape and visual impact appraisal (LVIA) has been submitted. The location is prominent and visible from a number of viewpoints used for recreation walking, horse-riding and cycling, all of which are considered sensitive receptors of visual impacts:

- *Oldstairs Road also National Cycle Route 1*
- *Public bridleway ER23 (SW from Victoria Road) and possibly as far west as Oxneybottom Wood*
- *Public bridleway ER24 (from Victoria Road towards Otty Bottom)*
- *Public Footpath ER285 (Freedown)*
- *Possibly PROW ER273 (near Oldstairs Road)*
- *Possibly PROW ER18 (adjacent to Wood Hill)*
- *Possibly PROW ER14, north of East Valley Farm, although vegetation may screen the long distance view*
- *Possibly PROW ER27, SW of barrow Mount, although vegetation is likely to screen this oblique view.*

Without an LVIA it is not possible to determine whether the proposed development would give rise to significant effects on the above receptors.

Additionally, the impact of the proposed development, including the proposed landscaping, on the local landscape character needs to be addressed through LVIA, to assess whether this would have a significant effect on its particular attributes.

It is recommended that the applicant provide a LVIA, following the Landscape Institute LVIA Guidelines, 3rd edition. Without such, the recommendation is for refusal on landscape grounds, specifically that the application does not conserve the landscape and natural beauty of the Kent Downs AONB, contrary to NPPF paragraph 115.”

38. These comments were received on the 4th January 2017, and since that time the applicant has submitted revised plans. However, it is not considered that the design measures incorporated mitigate the visual impact to an acceptable level and thus officers consider that these comments would remain unchanged.

39. In the absence of a Landscape Visual Impact Assessment (LVIA) it is not possible to understand how the applicant has arrived at the conclusion that that the siting of the building in this location is suitable.

40. Notwithstanding the above, given the exposed location of the site, it is questionable whether due consideration has been given to the location of the proposed building “to avoid or reduce” harm to an acceptable level, particularly without evidence showing that there are no other suitable sites that exist.

41. Section 4 of the Kent Downs AONB management plan contains landform and landscape character policies, including policy LLC1:

“The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.”

42. Whilst this is not a development plan policy it does give direction within the adopted supplementary guidance on how development proposals should be considered. The lack of evidence and open siting within the landscape makes it difficult to consider that the proposed development achieves the aims of policy LLC1.
43. Further to this, the prominent and dominant location of the maintenance building in the landscape would adversely affect the scenic beauty, heritage or nature conservation value of a heritage coast or undeveloped coast, contrary to saved Local Plan policy CO5.
44. Accordingly, the development proposals have not addressed the inspectors concerns and would result in a development that is incongruous and obtrusive in this sensitive location, contrary to Core Strategy policy DM16, policies LLC1 and LLC6 of the Kent Downs AONB management plan and paragraphs 114 and 115 of the NPPF.

Residential Amenity

45. Paragraph 17 of the NPPF seeks to ensure that planning decisions secure a good standard of amenity for all existing and future occupants of land and buildings.
46. The application site is located within the ground of Walmer and Kingsdown Golf Course and deliberately away from residential dwellings. The nearest dwellings are Hope Point Lodge and Kentbridge Lodge, which are situated to the west of the application site, accessed from Granville Road. The proposed maintenance building would be visible from the windows of these dwellings, however it would be cited a considerable distance away and given that the topography of the land slopes downwards away from the properties the structure would not appear overbearing or oppressive.
47. It is not considered that the operations associated with building will be harmful to the amenity of neighbouring residential occupants.
48. For these reasons, it is considered that the proposal would be contrary to the requirements of the NPPF in regard to residential amenity

Ecology and Biodiversity

49. Policy CP7 of the core strategy states that the integrity of the existing network of green infrastructure will be protected and enhanced through the lifetime of the Core Strategy. Planning permission for development that would harm the network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects. Proposals that would introduce additional pressure on the existing and proposed Green Infrastructure Network will only be permitted if they incorporate quantitative and qualitative measures, as appropriate, sufficient to address that pressure.

50. Paragraph 118 of the NPPF states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity.
51. The application site is located close to a European designated sites and therefore has the potential to affect their interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the Habitat's Regulations'). The application site is located 380 metres west of the Dover to Kingsdown Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI).
52. The previous application for the erection of a greenkeepers maintenance building (15/00491), was refused partly on ecology grounds.
53. *The proposals, by virtue of the scale, form, siting, location and appearance in the Kent Downs AONB and Heritage Coast and its close proximity to the Dover to Kingsdown Cliffs SAC and the Dover to Kingsdown Cliffs SSSI, would introduce an inappropriate, intrusive and harmful form of development into a part of the district that is renowned for its natural beauty and character, which would cause adverse effects to designated ecological sites of international importance.*
54. Whilst the calcareous grassland would not be impacted, it was the proximity of the building to the SSI and SAC that were of primary concern, coupled with a lack of information that would allow the local planning authority to assess the impact of the building on the nearby European Sites.
55. The location of the maintenance building has therefore been re-thought to overcome this reason for refusal and has attempted to address impact on the landscape, impact on existing residential properties and the potential for disturbance, views from public footpaths and views from outside the golf course.
56. Natural England, responded to the consultation stating that their previous comments for application 15/00491 would still apply. These comments stated that further information was required in order for the Local Planning Authority to determine whether or not the proposal would have a significant effect on the nearby European Sites and Site of Special Scientific Interest. They recommend that the following information is obtained.
- v. *Chemicals/oils likely to be used and stored at the proposed maintenance building for vehicle maintenance and washing; and*
- vi. *What drainage and other safeguards will be in place such that foul water and contaminants do not reach the nearby designated sites.*
57. The applicant has submitted details of the proposed drainage and safeguarding measures, however details of the chemicals and oils likely to be stored in the building are not disclosed. Given that the LPA are minded to refuse the application, this information was not obtained.
58. Officer's note that the application is now located approximately 380 metres away from the SSSI and SAC, whereas before it was only 78 metres away. In this regard, the applicant has sought to mitigate the impact the proposed development may have on the SAC and SSSI.

59. If further information was submitted, it would allow the LPA to assess the application against sections 61 and 62 of the habitats regulations.
60. The Councils ecological officer was consulted on the application who responded saying that the site is designated as being 'rank calcareous grassland.' Lowland calcareous grassland is a priority habitat for which every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' Comments follow to state that without compensation for loss of calcareous grassland, recommendation is refused on biodiversity grounds.
61. With the above in mind, the proposal would result in a loss of important ecological habitats in a local wildlife site, which is contrary to core strategy policy DM15 and paragraph 188 of the NPPF.

Archaeology

62. KCC archaeology were consulted on the application and responded saying that the site had the potential to yield significant Bronze Age and WW2 archaeological features or findings of interest. It is recommended that provision is made in any forthcoming planning consent for a programme of archaeological work, to be completed prior to commencement. This could be conditioned.

Highway Impact

63. Policy DM11 outlines how development that would generate travel will not be permitted outside the urban boundaries and rural settlement confines unless justified by development plan policies.
64. The proposed greenkeepers maintenance building would operate ancillary to golf course, and would be used by existing members of staff responsible for course maintenance. It is therefore considered that the development would not result in any additional vehicle movements.
65. In light of the above, the Council raise no objection to the proposed on highway grounds.

Conclusion

66. The development proposed comprises a large agro-industrial style building and associated hardstanding within the Kent Downs AONB and area of undeveloped heritage coast. The proposed maintenance building would appear prominent in the landscape and have an adverse visual impact on the areas protected natural beauty. Whilst the revised design approach was no doubt an improvement, this has not in the opinion of officers successfully mitigated the visual harm that would manifest as a result.
67. As with the previous application there is still concern over the siting of this development in a very sensitive and open location within the Golf Course. No LVIA was submitted with the application and therefore officers have not been able to understand the reason behind the chosen location for the proposal and its impact on identified landscape receptors.

68. It is considered that, subject to suitable explanatory work, there are likely to be other more suitable sites within the grounds of the golf course. There is no compelling evidence submitted to show that other sites have been duly considered and why this particular location is suitable.
69. Walmer and Kingsdown Golf Club is designated as a Local Wildlife Site, which is designated for its chalk (calcareous) grassland. The development proposed would result in the loss of rank calcareous grassland, without compensatory measures, which would result in the loss of an important ecological habitat.

Recommendation

Refuse planning permission for the following reasons:

- I The proposals, by virtue of the scale, form, siting, location and appearance in the Kent Downs AONB and Heritage Coast, would introduce an inappropriate, intrusive and harmful form of development into a part of the district that is renowned for its natural beauty and character, thereby being contrary to Dover District Local Plan policy CO5, Core Strategy policies DM15 and DM16, the aims and objectives for NPPF paragraphs 17, 56, 64, 109, 114, 115, in particular and policies LLC1 and LLC6 of the Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019.
- II The proposal, by virtue of its siting on chalk (calcareous) grassland, would result in a loss of important ecological habitats without any compensatory measures for this loss, thereby being contrary to Core Strategy policies CS7, DM15 and the aims and objectives of NPPF paragraph 118.

Case Officer

Chris Hawkins