

# Planning Statement

Land south of Longfield Road, Hook Green,  
Meopham

September 2025

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**Client**

Richborough

**Our reference**

PP0022

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# 1. Introduction

- 1.1 This Report has been prepared by Pinnacle Planning on behalf of our client Richborough (hereafter referred to as Richborough or “the Applicant”) in support of an outline planning application for the development of land to the south of Hook Green, on land to the south of Longfield Road (‘the Site’). The application is made in outline with all matters reserved except for the means of access.
- 1.2 The description of development is as follows:

*“Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved.”*
- 1.3 The Site comprises open countryside in the Green Belt and meets the definition of grey belt, as set out within the 2024 version of the NPPF. The Regulation 18b draft Site Allocations and Development Management Policies document from 2020 identified the site as an emerging residential allocation known as GB117: Land west of Wrotham Road, with an estimated capacity of 120 dwellings.
- 1.4 This Planning Statement sets out the context for the development by providing a description of the site and its surroundings, details of the proposed development, and a review of the relevant planning history and policy framework. It also assesses the proposals against the identified policy framework and presents a clear case for the grant of planning permission.
- 1.5 The application is accompanied by a full suite of technical supporting documentation and illustrative scheme drawings.

## **Richborough**

- 1.6 Richborough is a specialist strategic land promoter with a track record of delivery spanning over twenty years. The business acts in partnership with landowners to promote their holdings through the plan-making process and is committed to delivering high quality developments with the right blend of housing and infrastructure to meet local needs.
- 1.7 Richborough oversees the planning promotion process and work closely with local communities, planning officers, professional consultants and key stakeholders to create mutually beneficial schemes.

## **Structure**

- 1.8 This remainder of this Planning Statement is structured as follows:
  - Chapter 2 considers the Site and surrounding areas
  - Chapter 3 examines the relevant planning history
  - Chapter 4 describes the proposed development

- Chapter 5 discusses the relevant planning policy context
- Chapter 6 comprises the planning appraisal
- Chapter 7 provides an Affordable Housing Statement
- Chapter 8 provides draft Heads of Terms
- Chapter 9 concludes this statement.

## 2. Site and Surroundings

### Site Location and Context

- 2.1 The Site is located to the south of Hook Green to the south of Longfield Road. The Site is currently in agricultural use and has an existing farm access from Longfield Road.
- 2.2 The site is approximately 5.43 ha (13.42 acres) in size and is located to the south west of Longfield Road and north west of Meopham Community Academy and Helen Allison School. Low density contemporary housing is located on the opposite side of Longfield Road. A public footpath crosses the Site along the eastern edge. Topographically, the land falls towards a centralised low point from the south to the Longfield Road frontage. Whilst mature trees define the southeastern boundary, the northern area has a contrastingly more open aspect.
- 2.3 To the north of the Site, beyond Longfield Road, is a partially wooded area which is subject to a draft allocation for 180 dwellings (ref: GBS-H); to the immediate east is the Helen Allison School; and to the south and west is agricultural fields.
- 2.4 The Site provides the opportunity to create a gateway into Hook Green and to improve pedestrian connectivity and access to the countryside by linking existing footpath networks.

**Figure 2.1: Site Location (approximate site boundary in red)**



- 2.5 Hook Green is one of Gravesham Borough Council's (GBC) largest and most sustainable settlements, incorporating a good range of facilities and services which cater for the needs of local residents. These include a variety of shops, food stores (including a Tesco Express), café's, takeaways, a post office and commercial sites at Meopham Sidings. As well as Camer Parade, Hook Green has a primary school (Meopham Community Academy), a railway station and has access to the GP surgery, village hall, library and

secondary school in Meopham Green. Gravesend Town Centre is located approximately 7km to the north, on a regular bus route, and provides for weekly shopping and additional employment opportunities.

- 2.6 Hook Green and Meopham are located either side of the A227, a high quality bus corridor providing regular services to Gravesend and Sevenoaks (services 308 and 416). Additional services are available around school start and closing times.
- 2.7 The Site is located approximately 1.28km from Meopham train station to the north of Hook Green. The station can be accessed by the bus services on Wrotham Road. Meopham train station has regular services to London Victoria, Dover, Gillingham, and Ramsgate. Residents of Hook Green can reach central London in a train journey time of 40 minutes.
- 2.8 Table 2.1 below identifies the nearby amenities and associated distance from the application site.

**Table 2.1: Local Facilities (Table 8 of the Transport Assessment)**

Facility	Distance
St John the Baptist	800m
St Pauls Catholic Church	900m
Meopham Library	1.5km
Meopham Station Post Office	1.7km
Meopham Village Hall	1.8km
Southdown Shaw Allotments	2.3km
Meopham Green Baptist Church	2.3km
Helen Allison School	400m
Meopham Community Academy	550m
Meopham Secondary School	1.3km
Bowes Industrial Centre	2.3km
Gravesend Town Centre	7.9km
Meopham Medical Centre	1.3km
Meopham Pharmacy	1.7km
Meopham Dental Care	2.3km

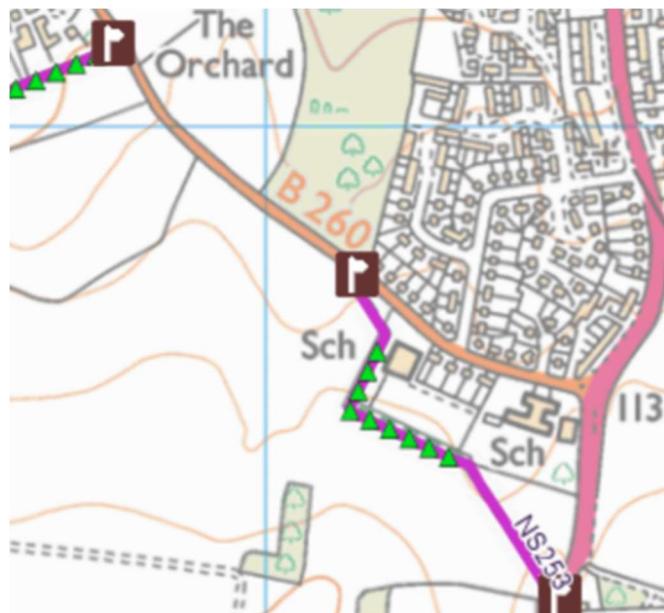
Judsons Recreation Ground	1.2km
Camer Park Country Park	1.3km
Meopham Leisure Centre	1.5km
The Lab Performance UK	1.6km
Frank Mulley Combat Academy	1.6km
Royal Hounds Dog Park	2.0km
Meopham Cricket Club	2.1km
Meopham Tandoori	600m
McCoy's Fish Shop	600m
Costa Coffee	600m
Café Lounge	600m
The Salon	650m
Meopham Shish Grill and Restaurant	650m
Tesco Express - including EVRI Parcel Drop off	650m
Sir Male Grooming (Barber Shop)	700m
Bartellas Mediterranean Restaurant	1.2km
George Inn Public House	1km
Valerries Sandwich and Coffee Shop	1.7km
Morrisons Daily	1.7km
Railway Tavern Public House	1.7km
The Cricketers Inn	1.8km
Minel Meze & Grill Restaurant / Bar	2km

## Technical Matters

2.9 The Environment Agency's (EA) online Flood Zone Map shows the Site is within Flood Zone 1 and is not at risk of surface water flooding.

2.10 There is one Public Right of Way (ref: NS253) crossing the site north east corner of the Site and traverses along the eastern boundary before travelling east away from the Site towards Wrotham Road.

**Figure 2.2: Kent County Council PRoW Map**



2.11 The Site is not subject to any statutory designations in respect of ecology or the historic environment. There is a degree of intervisibility between the Site and The Street Conservation Area to the east (approximately 500m from the Site). The Conservation Area includes two Listed Buildings: Grade I Listed Parish Church of St John the Baptist (ref: 1039866) and the Grade II Listed Church Cottages (ref: 1054716).

### **Summary**

2.12 The site is located in a sustainable location, with good access to local amenities and facilities, as well as public transport and pedestrian links.

## 3. Relevant Background

### Planning History

- 3.1 The Council's online application portal has been reviewed to understand if there have been any relevant planning applications. There is only one recent planning application of relevance at the site with two historic applications dating back to 1957 and 1988 in respect of proposals for a residential development and a country club, both of which were refused (application refs: 19570102 and 19880672).
- 3.2 A summary of the relevant planning history is provided below:

**Application reference: 20030188** - *"Outline application for the erection of 54 sheltered housing units; a community and office building and provision of a new vehicular access."*

- 3.3 The application was refused on 5 September 2003 with three reasons for refusal: inappropriate development in the Green Belt, loss of BMV agricultural land and adverse effects on the designated Special Landscape Area. The scheme was subsequently dismissed at appeal with the Secretary of State at that time concluding that the very special circumstances were not sufficient to justify inappropriate development in the Green Belt that would impact on openness, have a detrimental impact on the Special Landscape Area and lead to the loss of agricultural land.

### Environmental Impact Assessment

- 3.4 A request for a Screening Opinion was submitted to Gravesham Borough Council (GBC) on 22 April 2025. The request related to the development of 120 dwellings at the application site and a further 350 dwellings at a nearby site (land to the west of Wrotham Road and south of Green Lane) which is also being brought forward for development by Richborough with similar timescales for submission of the planning applications.
- 3.5 The two sites are the subject of separate planning applications and were considered together only in respect of the EIA Screening Request and pre-application consultation.
- 3.6 The Council provided a response to the Screening Opinion on 27 August and confirmed that the development is not Environmental Impact Assessment development and an Environmental Statement is not required.

### Pre-application Consultation

- 3.7 The Applicant has undertaken pre-application consultation with residents and stakeholders, as summarised below:
  - Formal Pre-application engagement with GBC;
  - Prior notification of the public consultation and providing further information in respect of milestones ahead of the planning application submission to Meopham Parish Council, Meopham North Ward Councillors and Meopham South and Vigo Ward Councillors;

- Pre-application discussions with Kent County Council Highways;
- Pre-application discussions with the Headmaster of Meopham Community Academy;
- Design Review Panel;
- Leaflet distributed to stakeholders and residents providing details of the proposal and how to comment; and
- A website with information relating to the proposals and the opportunity to provide written comments or complete a questionnaire.

3.8 The focus of the consultation strategy was to encourage comments and suggestions on the emerging proposals and any other issues which respondents thought should be considered.

3.9 A Statement of Community Engagement (SCE) is submitted alongside this planning application and provides further details on the engagement which has been undertaken.

3.10 Overall, the feedback received was helpful. Whilst the majority of comments expressed an objection to the development, there were some constructive suggestions relating to a range of different themes. The majority of comments highlighted the potential impact on existing services and amenities such as GP's and schools, whilst others raised concerns in respect of highway capacity and the loss of open countryside / Green Belt.

3.11 The Applicant has considered and responded to the concerns as set out within the submitted SCE.

## 4. Proposed Development

### Proposals

4.1 The description of development is:

*“Outline application for the erection up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.”*

4.2 The accompanying Design and Access Statement (DAS) provides a detailed description and assessment of the proposed development. Whilst the proposals are submitted in outline, the Illustrative Masterplan within the DAS includes a mix of house types and tenures which will help to meet the need for market and affordable housing in the local area and the wider Gravesham Borough.

4.3 The DAS also explains how the design has evolved in response to an appraisal of the opportunities and constraints of the site, including its surroundings, as well as the pre-application feedback from GBC, Design Review Panel, Kent County Council and the local community. Further details are also contained within the accompanying technical reports.

4.4 The proposed development will create an enhanced community for Hook Green and Meopham, supported by existing connectivity and transport routes. Access to green space and play space ensures a pleasant environment for people to live whilst improving health and wellbeing for new and existing nearby residents.

4.5 A summary of the proposal is provided below.

- Erection of up to 120 residential dwellings (including 50% affordable housing delivered in accordance with current national planning policy);
- New vehicular access road to be provided from Longfield Road;
- Explore the provision of a parking area for visitors to the schools on Longfield Road to ease on-street parking concerns related to school drop off and pick up times;
- Structural landscape planting, in the form of 1.89 ha of green infrastructure including general greenspace, play space, an orchard and new planting which is approximately 410% higher than the requirement of 0.37 ha; and
- New access arrangements including footway/cycle links.

### Design

4.6 An Illustrative Masterplan is provided within the DAS and demonstrates how the Site can be efficiently developed with a scheme for up to 120 dwellings. The Plan reflects site specific constraints to ensure the scheme creates a natural and logical extension to the existing built form and urban grain, with minimised environmental impact.

4.7 The design concept is centred around the themes of character and community, delivered through a high-quality, landscape-led proposal for Hook Green and Meopham.

4.8 The Illustrative Masterplan demonstrates one way in which the site could be developed, whilst considering the technical and environmental assessments that have been undertaken and consultation feedback that has been received. A Parameter Plan (Drawing Ref: P25-0485\_DE\_2006 Rev B) has been produced to illustrate the key principles, including the provision of land for drainage features, greenspace, access points and residential development parcels. The Parameter Plan will provide a sound framework on which to secure the final design at Reserved Matters stage.

4.9 The homes will be high quality, and the proposals will ensure that the site is not overdeveloped and complements the framework set out by nearby existing development. The house type design will reflect local character and materials used elsewhere in the local area. The Kent Design Guide and Gravesham Design Code have also been used to guide the proposals. The Gravesham Design Code Compliance Checklist has been completed and is provided at Appendix A of the DAS.

4.10 The key design features of the Illustrative Masterplan include:

- Safe access to be provided off Longfield Road with vehicular and pedestrian connectivity ensuring safe and accessible routes to local services and amenities including pedestrian links to existing bus stops the train station.
- A good mix of house types, including smaller houses for downsizers or single occupants and family housing. All of the proposed new dwellings will be M4(2) Building Regulations compliant and 10% of all units will also be M4(3) compliant to ensure older people and people with mobility problems can be accommodated.
- The proposed dwellings will be 2 - 2.5 storey in height.
- Use of buffer planting to screen the development from the south and west. This includes retention of existing tress and new hedgerow planting.
- An area of landscaped wetland referred to as Central Common on the northern side of the development, provision of amenity greenspace, footpaths, orchard planting and landscape screening.
- Use of SuDS in the form of a surface water attenuation feature in the northern area of the site.
- Active frontages with homes orientated towards both key internal streets, the countryside and Longfield Road on the northern site boundary.
- Introduction of a clear street hierarchy incorporating a principal street through to local streets, lanes and shared surfaces. Each reinforces areas of differing character and density with all dwellings utilising a variety of high-quality design and materials to reflect local character. The street hierarchy will also include the provision of street trees.

## **Housing Mix**

- 4.11 This application is proposing up to 120 new dwellings, including the provision of affordable housing at a rate that complies with the National Planning Policy Framework's 'Golden Rules'. This results in a 15% overprovision from the Council's policy requirement to 50%. The housing shown on the Illustrative Masterplan within the DAS is reflective of local housing needs and consists of a mix of apartments, detached, semi-detached and terraced homes. It is the intention that the affordable dwellings would be integrated throughout the development and be tenure blind to create an integrated community.
- 4.12 The tenure split for the affordable housing provision is to be agreed through the determination of the application but is anticipated to be 70% affordable housing for rent and 30% affordable home ownership in accordance with the Council's Housing Development Strategy.
- 4.13 Allowance has also been made across the Illustrative Masterplan such that all dwellings meet or exceed Nationally Described Space Standards and are M4(2) Building Regulations compliant for accessible and adaptable dwellings. A further 10% of all dwellings will be built to M4(3) Building Regulations standards to meet the needs of wheelchair users and those requiring enhanced accessibility.

## **Access**

- 4.14 Vehicular access is proposed as a priority junction from Longfield Road. The proposed access will have a 5.5m carriageway width, a 6m kerbed radii, and 2.0m footways either side tying into existing footways on Longfield Road.
- 4.15 With regard to pedestrian connectivity, the Development Framework Plan, shows internal footpaths throughout the site including in the landscaped edges. The PRoW on the eastern site edge is retained onsite and maintains the link to the offsite PRoW at the south eastern corner towards Wrotham Road.
- 4.16 Tactile paving is proposed as a crossing point on Longfield Road, close to the site access. This allows for pedestrians to access the wider footpath on the northern side of Longfield Road at school drop-off and pick-up times when roadside parking is prevalent on the southern side of Longfield Road.
- 4.17 Within the site, a hierarchy of street typologies is proposed including a main street and shared surfaces.
- 4.18 The proposed development, as shown on the Illustrative Masterplan included in the DAS, includes parking at a rate that is in accordance with the Kent Parking Standards set out in SPG4.
- 4.19 The proposed mitigation measures include the extension of the 30mph zone to the west of the site, provision of a gateway entry feature such as dragon teeth markings or rumble strips in the 60mph speed zone to make drivers aware they are entering a lower speed limit zone and vehicle activated speed signs within the 30mph zone to remind drivers if they exceed the speed limit.

4.20 The Parameter Plan indicates a parking area onsite for visitors to the local schools. KCC Highways raised concerns over the provision of this car park due to the potential promotion of vehicular trips where residents may otherwise walk. The car park onsite will be the subject of further consideration during the determination of the application.

## Layout and Landscaping

4.21 The Illustrative Masterplan and the Parameter Plan demonstrate how built development could be accommodated whilst ensuring that the Site is not overdeveloped, and the character of the local area is respected. The green space is provided to the north of the site, incorporating the SuDS feature for a comprehensive blue and green landscape strategy. In addition, greenspace to the south provides a landscaped buffer to transition to the countryside.

4.22 Existing trees and planting, particularly on the western edge of the site are to be retained and strengthened where possible. New planting will include trees, hedges, shrub planting, climbers, bulbs and wild-flower. Tree-lined streets will be incorporated into the layout to add to the street scenes and mark the initial arrival point. New tree planting will include ornamental and native species to encourage wildlife and enhance biodiversity. The scheme will achieve a 10% net gain in biodiversity and a BNG Metric is provided with the application submission.

4.23 The open space strategy incorporates blue and green infrastructure to ensure the SuDS are attractive and form part of usable open space that is attractive and suitable for habitat creation.

4.24 Policy requirements for the different greenspace typologies based on 120 dwellings are set out in the table below. These requirements are sourced from the Gravesham Open Space Standards Paper (2016) which establishes the requirements for open spaces within new residential development. The way in which the greenspace is divided across the site into the different typologies can be agreed as the application progresses, but the following table provides one potential scenario. Due to the size of the site, the allotment typology has been shown as a community orchard.

## Open Space Provision

Typology	Minimum Requirement (ha)		Proposed provision - Parameter Plan (ha)
	Per 1,000 residents	Per 120 Dwellings	
Amenity Greenspace	0.92	0.26	1.64
Play Space (children and young people)	0.03	0.009	0.05
Allotments	0.05	0.014	0.2

4.25 The open space figures will meet the open space requirements for all typologies and exceeds the requirement for Amenity Greenspace by a factor of five. This will make a major contribution to the provision of new accessible green space, which will meet one of the Golden Rules for grey belt eligibility.

4.26 The formal play provision will be provided in the form of one Local Area of Play (LAP) and one Locally Equipped Areas of Plan (LEAP) along with play on the way facilities.

4.27 The equipped areas of play proposed will be:

- Safely overlooked by adjoining properties and main circulation routes;
- Maintained to ensure quality and safety of play equipment is of highest standard;
- Accessible, with well-lit access for pedestrians and cyclists; and
- Located in logical well used and visible corridors to promote legibility and aid orientation.

## 5. Planning Policy

5.1 Section 38(6) of the Town and Country Planning Act requires that applications should be determined in accordance with the up-to-date adopted development plan unless material considerations indicate otherwise.

### Development Plan

5.2 In this context, the Gravesham Borough Council (GBC) Development Plan comprises:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) - saved Policies
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)

5.3 The strategic policies of the Local Plan should no longer be considered up to date given that the Core Strategy was adopted more than five years ago. In accordance with Paragraph 11 of the NPPF, strategic Local Plan policies need to be considered against their level of conformity with the policies of the NPPF before assigning a level of weight that should be applied to them.

5.4 The 2024 update to the NPPF makes significant changes to Green Belt policy, in particular, and the strategic policies relating to development in the Green Belt are now substantially out of date and limited weight should be attributed to them. The NPPF is therefore considered to be an important material consideration for the proposals.

5.5 This section identifies the key adopted Policies which are of most relevance to the proposals.

### Site Specific Policies

5.6 The Site is located within the Green Belt (CS02) and adjacent to the settlement boundary of Hook Green. See extract of the adopted Policies Map at Figures 5.1.

**Figure 5.1: Northern section of Site as shown on Sheet 9 of the Proposals Map**



5.7 The Site is not within a Mineral Safeguarding Area as identified in the Kent Minerals and Waste Local Plan.

5.8 Other relevant polices are provided below.

5.9 **Policy CS01: Sustainable Development** confirms where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the GBC will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

5.10 **Policy CS02: Scale and Distribution of Development** establishes that the overall housing requirement for the period 2011-2028 was for at least 6,170 new dwellings. This was to be delivered at a variable rate of at least 325 dwellings per year for 2011/2012 - 2018/2019; at least 363 dwellings per year for 2019/2020 - 2023/2024; and at least 438 dwellings per year 2024/2025 - 2027/2028.

5.11 Policy CS02 also confirms that the spatial strategy prioritises development in the urban area as a sustainable location for growth. In the rural area, development will be supported where it is compatible with national policies for protecting the Green Belt and policies with the adopted plan.

5.12 The supporting text to Policy CS02 at Paragraph 4.2.8 states:

*“The Core Strategy acknowledges that as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area before the end of the plan period to meet the Borough’s housing needs and sustain rural communities. The Green Belt has therefore been identified as a broad location for future growth and its boundaries will be subject to a review.”*

5.13 The section relating to the Scale and Distribution of Development highlights that an assessment of the facilities and services in the Borough’s settlements was carried out and Hook Green Meopham is identified as a second tier settlement. Furthermore, Meopham Green is identified as a separate settlement in the third tier, highlighting the sustainability of the area.

5.14 **Policy CS11: Transport** confirms new developments should mitigate their impact on the highway and public transport networks as required. Transport Assessments and Travel Plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.

5.15 Sufficient parking in new development will be provided in accordance with adopted parking standards

5.16 **Policy CS12: Green Infrastructure** confirms that a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. There will be no net loss of biodiversity in the Borough.

5.17 The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.

5.18 **Policy CS13: Green Space, Sport and Recreation** confirms that GBC will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.

5.19 **Policy CS14: Housing Type and Size** confirms that GBC will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

5.20 **Policy CS15: Housing Density** confirms that sites will be developed at a variety of densities, depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas. However, in the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.

5.21 **Policy CS16: Affordable Housing** confirms that affordable housing is to be provided on proposals for 3 dwellings or more in the rural area at a rate of 35%. GBC will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.

5.22 Development will be subject to site viability and a tenure mix necessary to meet local needs and achieve a successful sustainable and socially inclusive development.

5.23 **Policy CS18: Climate Change** relates to flood risk, water quality and demand, sustainable drainage and carbon reduction. The Policy confirms development will be directed sequentially to those areas at least risk of flooding and proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment.

5.24 GBC require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use and that Sustainable Drainage Systems are proposed on all developments where technically and financially feasible.

5.25 GBC require all new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption).

5.26 **Policy CS19: Development and Design Principles** confirms new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.

5.27 The Policy includes a number of design criteria against which a proposal will be assessed and includes reference to Kent Design.

5.28 **Policy CS20: Heritage and the Historic Environment** confirms that GBC will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place.

5.29 Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting and enjoyment. Specific reference is made to the Borough's urban and rural conservation areas.

5.30 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset.

### **Saved Policies of the Gravesham Local Plan First Review**

5.31 **Policy TC3: Development Affecting Conservation Areas** confirms where applications are for development within or affecting conservation areas it will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area. GBC will expect applications to contain sufficient details to enable the impact of the proposal upon the conservation area to be assessed.

5.32 **Policy TC7: Other Archaeological Sites** confirms that GBC may require an application to be submitted with additional information, in the form of an assessment of the archaeological or historic importance of the site in question and the likely impact of development. In certain cases, such an assessment may involve an evaluation excavation. Arrangements can be 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.

5.33 **Policy T3** confirms that the Highway Authorities will not normally permit any proposed development that generates significant volumes of commercial vehicle traffic, if it is not well related to the primary and district distributor network.

5.34 **Policy T4** confirms that the Highway Authorities will not normally permit any proposed development outside the confines of the built up area that generates significant vehicular or pedestrian traffic.

5.35 **Policy T5** confirms that the formation of new accesses to the roads forming the highway network shown on the Proposals Map, will not normally be permitted, except where no

danger would arise and where a properly formed access can be created in a location and to an acceptable standard.

- 5.36 **Policy T9** confirms that GBC will expect the highway layout of new residential developments to comply with the Kent Design Guide and the Vehicle Parking Standards, but in appropriate circumstances will encourage the use of “Traffic Calming” measures.
- 5.37 **Policy P3** confirms that GBC will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, unless justified as an exception.

### **Kent Minerals and Waste Local Plan (2020)**

- 5.38 **Policy CSW3** of the Kent Minerals and Waste Local Plan confirms that all new development must be designed in accordance with circular economy principles to minimise the production of demolition and excavation waste and to manage such waste in accordance with Policy CSW2. Additional circular economy principles include measures to allow for the ease of redevelopment and refurbishment and to maximise sustainable construction methods including methods of reducing waste and easing deconstruction.
- 5.39 A Circular Economy Statement is required for developments of more than 10 units.
- 5.40 All new development should include consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed.

### **Material Considerations**

- 5.41 There are several key documents that are material considerations in the determination of a planning application. These points are considered in turn below.

#### **A National Housing Shortage**

- 5.42 Since the publication of the original National Planning Policy Framework (“NPPF”) in March 2012, all Governments have repeatedly emphasised the commitment to significantly boosting the supply of housing. In the intervening period there have been a series of reforms aimed at speeding up and increasing the delivery of new housing.
- 5.43 The Housing White Paper (HWP), published in 2017 reaffirmed the scale and significance of the national housing challenge:

*“The housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We’re already living in it. Our population could stop growing and net migration could fall to zero, but people would still be living in overcrowded, unaffordable accommodation*

*If we fail to build more homes, it will get even harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse.<sup>1</sup>*

5.44 The implications of the housing shortage for economic growth were also made clear:

*"Sky-high property prices stop people moving to where the jobs are. That's bad news for people who can't find work, and bad news for successful companies that can't attract the skilled workforce they need to grow, which is bad news for the whole economy.<sup>2</sup>"*

5.45 The Secretary of State was emphatic on what needs to change:

*"We need radical, lasting reform that will get more homes built right now and for many years to come.<sup>3</sup>"*

5.46 The proposed reforms included within the HWP included the introduction of the Housing Delivery Test and a standard method of calculating local housing need. The Government subsequently revised the Framework in 2019 to accommodate these measures amongst others, largely as a result of the continuing political commitment to increasing the delivery of housing in order to help 'tackle' the housing crisis.

5.47 A Planning White Paper, titled 'Planning for the Future', was published in 2020. The introduction highlighted several problems which hinder the planning process, one of which was housing delivery, highlighting that:

*"It simply does not lead to enough homes being built, especially in those places where the need for new homes is the highest. Adopted Local Plans, where they are in place, provide for 187,000 homes per year across England - not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (over 241,000). The result of long-term and persisting undersupply is that housing is becoming increasingly expensive, including relative to our European neighbours. In Italy, Germany and the Netherlands, you can get twice as much housing space for your money compared to the UK. We need to address the inequalities this has entrenched"<sup>4</sup>*

5.48 After the General Election in July 2024, the incoming Government published a consultation on reforms to the NPPF and other changes to the planning system, which stressed the importance of planning to meet housing needs.

5.49 The consultation was seeking views on reversing changes made to the NPPF in December 2023, which were considered to run counter to *"this Government's ambitions on increasing housing supply"*.

5.50 Along with achieving universal coverage of Local Plans, a change to the standard method for assessing housing needs was also proposed in order to support the Government's aim to deliver 1.5 million homes over the next five years.

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<sup>1</sup> Page 15, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

<sup>2</sup> Page 11, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

<sup>3</sup> Foreword by Rt Hon. Sajid Javid MP, Secretary of State, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

<sup>4</sup> Page 15, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

- 5.51 In July 2024, Angela Rayner, the Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government, wrote to the local authority leaders in England on the subject of *“Playing your part in building the homes we need”*.
- 5.52 This identified the current situation as dire, highlighting the tough choices that would be necessary to fix the foundations of the housing system.
- 5.53 The proposals have since been implemented though an update to the NPPF in December 2024. A WMS by the Minister of State for Housing and Planning<sup>5</sup> was made on the same day that the updated NPPF was published. The WMS states at its outset that [emphasis added]:

*“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.*

*That is why the Plan for Change committed to rebuild Britain, with the hugely ambitious goal of delivering 1.5 million new homes this Parliament, and the vital infrastructure needed to grow our economy and support public services.”*

- 5.54 At present, housing delivery across the country is still well short of the Government target of 300,000 new homes per annum.
- 5.55 In November 2021, the Land Promoters and Developers Federation (LPDF) published a Paper titled ‘The Housing Emergency’. This highlighted research undertaken by Shelter which identified that around 17.5 million in England (around 1/3 of the population) live in overcrowded, dangerous, unstable or unaffordable housing<sup>6</sup>.
- 5.56 Research undertaken by the LPDF shows that during the previous 11 years, the number of households who are renting has increased by 24% and during this period, the mean rent has increased by 46%. It is findings such as this which explain why the average age of the first time buyer continues to rise, and in 2019/20 stands at 34 years old<sup>7</sup>.
- 5.57 The Housing Emergency paper also highlights research from Heriot-Watt University, which indicates that housing need may actually be much higher than the Government target, somewhere in the region of 340,000 dpa. Both the Heriot-Watt research and the Government are in unison on the position that this is not a matter for future generations to address and needs to be tackled now if there is any hope of abating the emergency.

### **National Planning Policy Framework (NPPF)**

- 5.58 The Revised NPPF was published in December 2024 and sets out the Government’s planning policies for England and how they are expected to be applied in decision-making and plan making.

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<sup>5</sup> Building the Homes We Need (12 December 2024)

<sup>6</sup> Denied the right to a safe home: exposing the housing emergency (Shelter, 2021)

<sup>7</sup> ONS (2021)

5.59 Those elements of the NPPF identified as most relevant to this application are discussed in more detail below.

### **Achieving Sustainable Development**

5.60 Paragraph 10 sets out that a 'presumption in favour of sustainable development' is at the heart of the Framework and should be applied to plan-making and decision-taking to ensure that sustainable development is pursued in a positive way.

5.61 Paragraph 11 defines the presumption in favour of sustainable development as approving development proposals that accord with an up to date development plan.

5.62 The clear expectation running throughout the NPPF is that sustainable development should be positively embraced to deliver the necessary economic growth and housing needed to create inclusive and mixed communities. Local Planning Authorities (LPAs) are therefore encouraged to approach decisions on proposed developments in a positive manner and should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan without delay<sup>8</sup>.

### **Development Plans**

5.63 Paragraph 12 of the NPPF reiterates the status of the Development Plan as the starting point for decision making.

5.64 Paragraph 232 of the Framework identifies that existing policies should be given due weight should be given to policies in accordance with their degree of consistency with the Framework.

### **Green/Grey Belt**

5.65 The NPPF confirms that permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance, including the Green Belt, provides a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole.

5.66 Paragraph 143 of the NPPF states the five purposes of the Green Belt:

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

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<sup>8</sup> Paragraph 11 and 38

5.67 Paragraph 154 advises LPAs that the construction of new buildings in the Green Belt is inappropriate, with the following exceptions:

- a) *buildings for agriculture and forestry;*
- b) *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) *limited infilling in villages;*
- f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- h) *Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
  - i. *mineral extraction;*
  - ii. *engineering operations;*
  - iii. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
  - iv. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
  - v. *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
  - vi. *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”*

5.68 The definition of grey belt land is provided in the NPPF at Annex 2 and states:

*“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.*

*'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."*

5.69 Paragraphs 155 and 156 relate to applications for development in the Green Belt and state:

*"155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed;*
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

*156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:*

- a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b) necessary improvements to local or national infrastructure; and*
- c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces."*

### **Housing Development**

5.70 In order to support the Government's objective of "*significantly boosting the supply of homes*", paragraph 61 of the Framework reiterates the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with planning permission is developed without delay.

5.71 Paragraph 63 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

5.72 Paragraph 64 of the Framework sets out that where there is a need for affordable housing is identified, planning policies should specify the type of affordable housing required and

expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.

5.73 Paragraphs 78 to 81 of the Framework provide policy direction in regard to maintaining the supply and delivery of housing in order to assist the Government in significantly boosting supply. In particular, the Framework required LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating).

5.74 Paragraph 129 relates to making effective use of land and states that:

*"Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places."*

#### **Promoting healthy and safe communities**

5.75 Paragraph 96 of the Framework identifies that development should aim to achieve, healthy, inclusive and safe places by promoting social interaction, creating a safe and accessible environment so that crime and disorder do not undermine the quality of life or community cohesion and enabling and supporting healthy lifestyles.

#### **Achieving well-designed places**

5.76 Chapter 12 of the NPPF confirms that the creation of high quality development is fundamental to what the planning and development process should achieve.

5.77 Paragraph 131 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

5.78 Paragraph 135 reiterates that planning policies and decisions should ensure developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>49</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

### **Other relevant chapters**

5.79 Other chapters of the Framework seek to ensure that development:

- Builds a strong competitive economy;
- Promotes sustainable transport;
- Meets the challenge of climate change, flooding and coastal changes;
- Conserves and enhances the historic environment; and
- Facilitates the sustainable use of materials.

### **National Planning Practice Guidance**

5.80 The National Planning Practice Guidance (PPG) has been issued by Government as a technical companion to the NPPF. The PPG is an online resource which is subject to ongoing review and update.

5.81 The PPG was updated on 27 February 2025 in respect of Green Belt, with the changes focussing on assessing Green Belt and identifying grey belt land.

5.82 This confirms that in regard to Green Belt Purpose A, this relates to the sprawl of large built up areas, and that villages should not be considered large built up areas.

5.83 Similarly, in respect of Purposes B and D, these relate to towns and not villages.

## **Kent Design Guide**

5.84 The Kent Design Guide serves as a comprehensive framework to promote high-quality design and sustainable development across Kent and offers guidance to designers, engineers, planners, and developers, with an aim of achieving consistent and exemplary standards in construction and urban planning.

5.85 Structured into several key sections, the guide begins with an introduction to the value of good design, emphasizing its importance in creating vibrant, safe, and attractive communities. It then outlines a step-by-step approach to the design process:

- Understanding the Site: Assessing the site's context, including its history, topography, and surrounding environment.
- Generating the Layout: Developing a layout that responds to the site's characteristics and meets the needs of its users.
- Designing for Movement: Ensuring that the design facilitates safe and efficient movement for all users, including pedestrians, cyclists, and vehicles.
- Getting the Detailing Right: Focusing on the finer details of design to enhance the overall quality and longevity of the development.

5.86 Car parking standards are provided in the Design Guide and propose minimum standards and recommendations based on the location of the proposed development. The Site's sustainable location close to sustainable public transport routes means the parking requirements are expected to accord with the "Suburban" settlement type.

## **Gravesend Design Code**

5.87 The Design Code expands on the design policies of the Local Plan Core Strategy to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

## **Emerging Gravesend Local Plan**

5.88 GBC is preparing a new Local Plan, to replace the out of date adopted Local Plan. Regulation 18 Stage 1 and 2 Local Plan consultations have taken place, including engagement on the Site Allocations and Development Management Policies document. The most recent period of consultation was undertaken between October and December 2020.

5.89 The Site was identified as an emerging allocation known as GB117: Land west of Wrotham Road, Hook Green, with an estimated capacity of 120 dwellings.

5.90 The Regulation 18 Stage 2 consultation document identified Hook Green Meopham as a second tier settlement and identified this tier as "*Large Villages including clustered sustainable settlements - Suitable for expansion and accommodating some growth*".

5.91 The consultation document also identified the benefits of capitalising on the functional relationship between Hook Green Meopham and Meopham Green to create a single clustered settlement. The Settlement Hierarchy Background Paper specifically

highlighted that the services in the two settlements complement each other, and they are able to function together to provide the full range of services to meet the day-to-day needs of the residents in both settlements.

5.92 Progress with preparing a new Local Plan has stalled due to national planning policy changes and evidence gathering in relation to the Lower Thames Crossing, but the Regulation 19 version is expected to be published in August 2025.

### **Gravesham Stage 2 Green Belt Study**

5.93 GBC Published the Stage 2 Green Belt Study in August 2020. The application site is identified as Parcel HG7. The assessment concludes that Parcel HG7:

- makes a limited/no contribution to purpose 1 - checking the unrestricted sprawl of large built up areas,
- makes a limited/no contribution to purpose 2 - preventing neighbouring towns from merging
- makes a significant contribution to purpose 3 - assist in safeguarding the countryside from encroachment
- makes a limited/no contribution to purpose 4 - preserving the setting and special character of historic towns
- makes an equal contribution to purpose 5 - assisting urban regeneration

5.94 The assessment confirms that Hook Green is not a large built-up area or a historic town and therefore makes no contribution to purpose 1 and 4. In respect of purpose 2, the assessment confirms:

*“This land does not lie in a gap between neighbouring towns and does not make any contribution to this purpose.”*

5.95 The impact of the Site's release on the contribution of adjoining Green Belt land is identified as moderate with the following justification:

*“Release of land to the south of Hook Green would further breach Longfield Road as well as the school fields surrounded by tree lines bounding the south of the settlement, resulting in a minor weakening of distinction between the inset settlement and the Green Belt. In addition, release would minorly increase containment of adjacent Green Belt land, notably between Hook Green and Meopham Green to the south.”*

### **Housing Delivery Test**

5.96 The Housing Delivery Test result for 2023 was published in December 2024 and GBC measured 59%. GBC have failed to deliver the number of homes required (1,789 dwellings) over the three year period 2020/21 - 2022/23 and have fallen substantially below the 75% threshold for 'significant under delivery'. Therefore, GBC are required to:

- 5.97 Include a 20% buffer to their identified supply of specific deliverable sites as established at paragraph 79 of the NPPF
- 5.98 Prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery, and
- 5.99 Apply the presumption in favour of sustainable development having regard to footnote 8 of the NPPF.
- 5.100 GBC prepared an Action Plan in 2020 due to failing the Housing Delivery Test. With regard to tackling under-delivery through active management of the application process, the Action Plan references increased use of Planning Performance Agreements, use of a Design Review Panel and adoption of additional Supplementary Planning Documents.

### **Five Year Housing Land Supply**

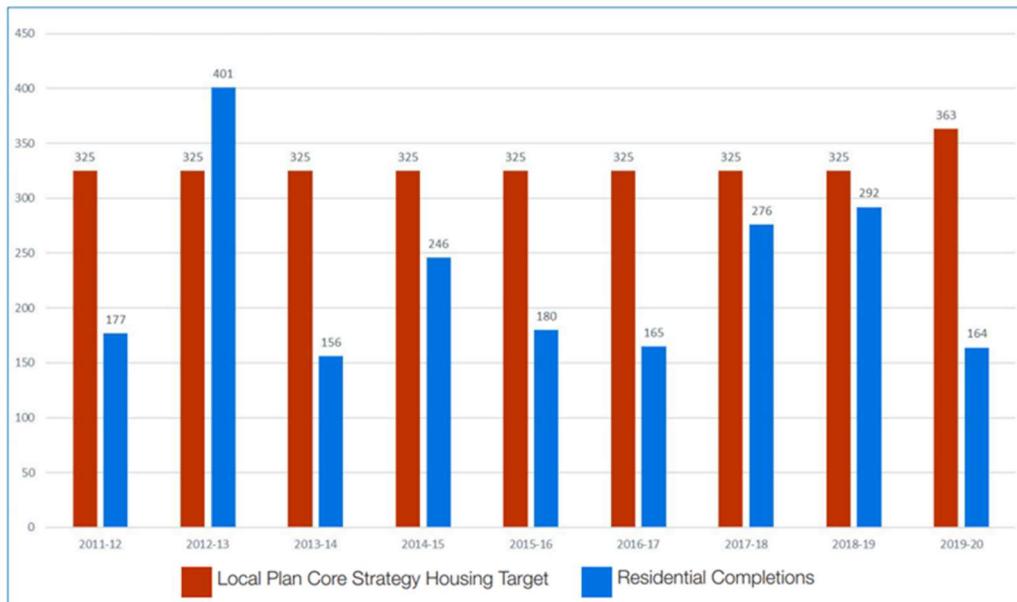
- 5.101 The most recently published Five Year Housing Land Supply Statement covers the period 2024-2029 and was published in February 2025.
- 5.102 The Statement confirms that the five year housing land supply position as of 1 April 2024 stands at 3 years and takes account of the update to the standard method calculation in December 2024. GBC's total five year requirement including a 20% buffer is 4,032 dwellings and the deliverable land supply totals only 2,429 dwellings. This is a deficit of 1,603 dwellings, which is substantial and should attract significant weight in the planning balance.

### **Market Housing Delivery**

- 5.103 Policy CS02 establishes that the overall housing requirement for the period 2011-2028 was for at least 6,170 new dwellings. This equates to 363 dpa, which is 56% lower than the updated standard method figure for GBC (2025).
- 5.104 The Housing Delivery Action Plan (2020) provides the most up to date housing completions data, with the extract at Figure 5.1 below highlighting the poor rate of delivery against the adopted requirement. Only one year, in the nine recorded to 2019/20 saw housing completions meet the annual housing requirement, with all other years falling below 300 dwelling in total.

**Table 5.1: Extract of Figure 4 of the Housing Delivery Action Plan 2020**

Figure 4: Net dwellings completed in Gravesham 2011-2020



5.105 The completions data from the 2023 Housing Delivery Test update and the Net Additional Dwellings (Table 123), both published by MHCLG, identify the figures for the subsequent years as follows:

- 2020/21 - 217
- 2021/22 - 420
- 2022/23 - 419
- 2022/23 - 293

5.106 Whilst annual delivery increased in two of the last four years, this is still significantly lower than the relevant housing need figure at the time.

5.107 The cumulative shortfall in housing delivery since the start of the Plan Period in 2011, using the adopted requirement for 2011-2020 and the relevant standard method figure for 2021-2024, has reached 2,266 dwellings.

### Affordable Housing Delivery

5.108 In respect of affordable housing completions, the SHMA 2016 identifies an affordable requirement of 344 dwellings per annum from 2014<sup>9</sup>.

5.109 Using the available Government statistics on affordable housing delivery<sup>10</sup>, GBC delivered just 1,048 affordable dwellings in the ten years between 2014 and 2024. The annual need figure has not been met once in that period (the highest year was in 2021/22

<sup>9</sup> Paragraph 9.33, SHMA (2016), GVA

<sup>10</sup> Live Table 1008C: Total additional affordable dwellings provided by local authority area

and still saw a deficit of 178 dwellings). The cumulative shortfall of affordable dwellings between 2014/15 and 2023/24 is 3,215 dwellings.

5.110 The impact of this poor rate of delivery is impacting affordability and the rate of affordable housing being delivered. The affordability ratio, the ratio of median house price to median gross annual residence-based earnings, has reached 10.8 in 2022. This is up from 5.98 in 2011 at the start of the Plan Period.

## **Summary**

5.111 GBC is unable to demonstrate a five year supply of deliverable housing sites, with a deficit of 1,603 dwellings, which is significant. The Housing Delivery Test reveals a significant shortfall in historic housing delivery as it achieved only 59%. Therefore, GBC must apply the presumption in favour of sustainable development having regard to footnote 8 of the NPPF.

5.112 There is a clear and evidenced significant housing need in the Borough, and this is also reflected by the worsening affordability.

## 6. Planning Assessment

### Background

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 Paragraph 11 of the NPPF establishes a presumption in favour of sustainable development, and for decision-taking this means approving development proposals that accord with an up-to-date development plan, without delay.
- 6.3 Section 5 of this Statement has identified the relevant Development Plan policies and other material considerations which may carry weight in the decision-making process. It has been established that the policies of the Local Plan should no longer be considered up to date at this time. In order to address this point, GBC is preparing a new Local Plan, within which the Site is a draft allocation.

### Principle of Development

#### Strategic Policy

- 6.4 The Adopted Policies Map confirms that the application Site is located adjacent to, although outside of the defined Settlement Boundary for Hook Green and is within the Green Belt as well as the defined 'rural area'.
- 6.5 Policy CS02 is titled 'scale and distribution of development and establishes the housing requirement and the spatial strategy for the plan period, 2011-2028. In regard to the rural area, the Policy states:

*"development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan."*

- 6.6 As noted in Section 5 of this Statement, the 2024 update to the NPPF makes significant changes to Green Belt policy, and the strategic policies relating to development in the Green Belt are now substantially out of date.
- 6.7 It is clear therefore that proposals in the Green Belt and rural area will be supported where they accord with national policy on Green Belt and the relevant policies within the Core Strategy.
- 6.8 Furthermore, Policy CS02 goes on to state that:

*"A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt."*

6.9 The applicant also considers the following supporting text to Policy CS02 to be relevant in this instance [emphasis added]:

*“The Core Strategy acknowledges that as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area before the end of the plan period to meet the Borough’s housing needs and sustain rural communities. The Green Belt has therefore been identified as a broad location for future growth and its boundaries will be subject to a review.”*

*“...the Core Strategy acknowledges that there is insufficient land supply identified in the current SLAA to meet the level of housing need over the whole plan period. To address this, the Council will carry out a revised SLAA to identify additional land to meet the Borough’s housing needs and maintain a five year rolling supply of deliverable sites over the plan period. This will be informed by a review of development opportunities in the existing urban area and rural settlements inset from the Green Belt and by a Green Belt boundary review.”*

6.10 It is clear therefore that the need to release land from the Green Belt is embedded in the current Local Plan Core Strategy. The reference to the release of land to meet a shortfall in the housing land supply via a focussed Green Belt Review was included within the Core Strategy by the examining Inspector as a Main Modification<sup>11</sup>. The modifications were seen as necessary to help meet identified housing needs, including those local needs arising in the settlements outside Gravesend and thus for the plan to be sound<sup>12</sup>.

6.11 A further modification was also required to the Core Strategy at the examination stage in order to “backload” the delivery of housing, which necessitated a variation to the housing trajectory incorporating material increases in delivery over three distinct parts of the overall plan period. The Inspector deemed that it was *“simply not practical in Gravesend at the moment”* to frontload the delivery and that this was due to a number of reasons including the lack of sites which are outside of the Green Belt<sup>13</sup>.

### **Grey Belt Eligibility**

6.12 The updated NPPF introduces the concept of grey belt, which is defined in Annex 2 as follows:

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

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<sup>11</sup> Paragraph 69, Report on the Examination into the Gravesend Local Plan Core Strategy (2014)

<sup>12</sup> Paragraph 70, Report on the Examination into the Gravesend Local Plan Core Strategy (2014)

<sup>13</sup> Paragraph 45, Report on the Examination into the Gravesend Local Plan Core Strategy (2014)

- 6.13 The Site was assessed as part of the Stage 2 Green Belt Study (2020), forming part of parcel HG7. It was found to make a limited or no contribution to purpose A, B and D and a significant contribution to purpose C.
- 6.14 The PPG was updated in February 2025 in respect of Green Belt, with the changes focussing on assessing Green Belt and identifying grey belt land.
- 6.15 The PPG confirms that in regard to Green Belt Purpose A, this relates to the sprawl of large built up areas, and that villages should not be considered large built up areas<sup>14</sup>.
- 6.16 Hook Green Meopham is identified as second tier settlement established as part of Policy CS02. Given the scale of the settlement, Hook Green is clearly a village and not a large built up area, meaning that the Site cannot contribute strongly to Purpose A.
- 6.17 Even if this were not the case, the PPG is clear that for an assessment area to make a strong contribution, it should be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development; and, if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt). The development would not result in an incongruous pattern, given the existing development either side of Longfield Road. The contribution of the Site to Purpose A cannot be considered to be strong.
- 6.18 In regard to Purpose B (to prevent neighbouring towns merging into one another), the PPG is clear that this relates to merging of towns and not villages. Similarly, in regard to Purpose D (to preserve the setting and special character of historic towns), the PPG is clear that this relates to historic towns, and where these aren't present, it may not be necessary to provide a detailed assessment. In this regard, Hook Green cannot be described as a town, and the contribution of the Site to either purpose is not strong.
- 6.19 The conclusions on Purposes A, B and D are consistent with the site-specific Green Belt Assessment, prepared by Tyler Grange, provided at Section 8 of the submitted LVIA.
- 6.20 Furthermore, the application of policies relating to the areas or assets in footnote 7 (other than Green Belt) would not provide a strong reason for refusing or restricting development.
- 6.21 This qualifies the Site to be eligible as grey belt based on the definition within the NPPF.

### **Not Inappropriate Development**

- 6.22 Paragraph 155 of the NPPF establishes a series of criteria which should all apply if the development of homes in the Green Belt is to be regarded as inappropriate.
- 6.23 The first requirement is that the proposed development would not fundamentally undermine the purposes of the remaining Green Belt. Having regard to the above eligibility assessment of grey belt and the conclusions of the Stage 2 Green Belt Study (2020), this criterion is met.

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<sup>14</sup> PPG Reference: 64-005-20250225

6.24 As evidenced at Section 5, there is a demonstrable unmet need for housing in the Borough, which is the second criterion. The Inspector granted relief to GBC from meeting the annualised average housing figure across the seventeen year plan period by applying a stepped trajectory for delivery. Despite this relief, housing completions still remain well below the intended trajectory, which confirms that the current supply of housing land is not flexible enough to ensure that land is brought forward at sufficient pace.

6.25 This is illustrated by the consistent failure to pass the Housing Delivery Test between 2020 and 2023, with the most recent score for 2023, being only 59%.

6.26 Furthermore, GBC's most recently published Five Year Housing Land Supply Statement (published in February 2025) indicates a best case 3 years supply, with a substantial deficit of 1,603 dwellings. This is without the applicant critiquing the delivery of a single dwelling in the supply and should attract significant weight in the planning balance.

6.27 Having regard to the NPPF, in either of these circumstances, the presumption in favour of sustainable development applies. In accordance with paragraph 11d of the NPPF this has implications for decision-taking with the tilted balance being engaged, which means the policies which are most important for determining the application are out-of-date. The NPPF confirms that permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance, including the Green Belt, provide a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole.

6.28 The Site is located within Hook Green with access to Meopham railway station within a short cycle distance and accessible by foot. The Site is also close to existing amenities including the primary school and Camer Parade, with other facilities including a secondary school and GP surgery less than 1 mile away in Meopham Green and can be accessed with frequent bus services. The Site is sustainable and a suitable location for further residential development.

6.29 GBC prepared a Settlement Hierarchy Paper in 2020, which considers the sustainability and role of settlements. In regard to Hook Green, the document states [emphasis added]:

*"5.18 Meopham Green is a long settlement located immediately to the south of Hook Green. Given the proximity between the two settlements (1200m from the GP surgery in Meopham Green to the local centre at Camer Parade), the services available in each settlement are accessible to the residents of both settlements; on foot and by cycling for some residents or by bus (frequent service). Hook Green offers a good range of retail services, a primary school and a railway station, which provides links to Medway Town and London. These compliment the services found in Meopham Green. Given their proximity and the range of services available, the two settlements are able to function together to provide the full range of services to meet the day-to-day needs of the residents in both settlements.*

*5.19 For the purposes of the settlement hierarchy, it is proposed to capitalise on this functional relationship and the range of services and facilities, including the good public transport links that are available in each settlement, to create a single clustered settlement."*

6.30 It is concluded that the Site complies with the third criterion and should be considered as a sustainable location.

### **Golden Rules**

6.31 The fourth criterion comprises the requirement to meet the 'Golden Rules' requirements which are set out in paragraphs 156-157 of the NPPF. The proposals would fully comply, and the following is highlighted:

- Provision of a minimum of 50% affordable housing which equates to 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development (Policy CS16 of the Core Strategy seeks up to 35%). Applications for 50% affordable housing in this location will also support the worsening affordability of the Borough and meet local needs. This provision would be secured through the proposed S106 agreement.
- Contribute to necessary improvements to local or national infrastructure. The proposals would provide necessary improvements to local infrastructure through offsite active travel improvements. This provision would be secured through the proposed S106 agreement.
- Contribute to the provision of new, or improvements to existing, green spaces that are accessible to the public (existing and future residents of Hook Green). The proposals would provide new green spaces which are accessible to the public with the provision of 1.89 ha of publicly accessible open space (excluding 0.55 ha of SUDS). This provision is secured through the submitted Parameter Plan.

6.32 Accordingly, it is concluded that the Site is grey belt land, and the proposals meet the Golden Rules set out in the NPPF. The proposals are therefore not inappropriate development in the Green Belt and 'very special circumstances' do not need to be demonstrated.

6.33 Furthermore, the proposals are in accordance with NPPF paragraph 158 which states that *"A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission."*

6.34 The proposals therefore comply with the principle of Policy CS02 which supports proposals where they accord with national policy on Green Belt.

6.35 A recent judgment<sup>15</sup> reaffirmed the position that appropriate development does not give rise to harm to the Green Belt. The judgment states at Paragraph 19 that *"it is quite clear 'buildings for agriculture and forestry', and other development that is not 'inappropriate' in the green belt, are not to be regarded as harmful either to the openness of the green belt or to the purposes of including land in the green belt"*.

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<sup>15</sup> Mole Valley District Council v MHCG [2025] EWHC 2127 (Admin)

## Very Special Circumstances

6.36 As noted above, having had due regard for the updated PPG on the Green Belt, it is evident that the Appeal Site makes no contribution to Green Belt purposes A, B or D.

6.37 In respect of Purpose C (assist in safeguarding the countryside from encroachment), the Green Belt Study identifies the site as making a significant contribution with the following justification:

*"The school fields have limited distinction from the settlement edge, and their use is associated with the adjacent inset settlement, but the farmland beyond has stronger distinction from the settlement edge and is more readily perceived as countryside. As such, the area predominantly contains the characteristics of countryside and has a strong relationship with the wider countryside."*

6.38 Gravesham is heavily constrained by Green Belt and therefore are having to look at Green Belt locations to accommodate the Borough's housing needs. The Site is sustainably located and is adjacent to existing built development (to the east and part of the northern boundary) and lies to the south of a draft residential allocation (ref: GBS-H for 180 dwellings). The proposed built development has an envelope that aligns with the depth of the adjacent Helen Allison School and does not seek to protrude or extend the settlement edge as a new finger of development. The Parameter Plan includes a landscaped buffer to the sites southern boundary and the retention, where possible, of existing soft landscape on this boundary. This will ensure the impact of the proposed development on the adjoining Green Belt will be minimised.

6.39 It is therefore considered that there is a clear distinction across the parcel, and the subject site would result in a much lesser impact on Purpose C. This is consistent with the conclusions of the site specific Green Belt Assessment, prepared by Tyler Grange, provided at Section 8 of the submitted LVIA.

6.40 The Green Belt Study confirms that all Green Belt land makes an equal contribution to purpose E.

6.41 In the event that the proposals are considered to be inappropriate development in the Green Belt, it is necessary to demonstrate that 'very special circumstances' exist which outweigh any potential harm to the Green Belt by way of inappropriateness and any other harm in order to comply with paragraphs 153 and 154 of the NPPF.

6.42 The significant economic, social and environmental benefits of the proposals are set out in the Conclusion (Section 9). It is considered any harm is outweighed by the significant benefits which attract substantial weight and that very special circumstances exist in this instance. This includes the provision of new high quality market housing and a 50% level of affordable housing in an area where there is evidence of a historic shortfall of affordable housing delivery and significant unmet need.

## Summary on Principle of Development

6.43 Whilst the Applicant can demonstrate the suitability of the Site for residential development through grey belt provisions in the NPPF, the benefits of the proposed development, as

provided below, also comprise very special circumstances that outweigh any harm to the Green Belt having regard to paragraph 153 of the NPPF.

6.44 The NPPF also references a need to have regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. It is clear that there is a degree of support from GBC for the development of the Site as it was considered suitable as draft allocation in the emerging Gravesham Local Plan.

6.45 The proposals comply with the principle of Policy CS02 which supports proposals where they accord with national policy on Green Belt. In any case, the benefits of the schemes significantly outweighs any identified area of conflict, and the principle of development should be considered acceptable. The Site is sustainably located and forms a logical extension to the existing residential area of Hook Green to meet the housing needs of the Borough.

## **Design, Layout and Mix**

6.46 The Illustrative Masterplan within the DAS shows how the Site could accommodate a scheme of up to 120 dwellings that can deliver a high-quality landscape-led development.

6.47 Whilst the proposals will be submitted in outline, the Illustrative Masterplan shows how a scheme that would retain the local character of the area and existing residential properties. It will create an enhanced community for Hook Green, supported by existing connectivity and transport routes, and integrating into the existing settlement.

6.48 An internal spine road accessed from Longfield Road is proposed to link to a series of street typologies and built development blocks providing visual interest and variety. A distinguished built form and a strong design hierarchy helps to create character and identity, with opportunities to explore an architectural typology which responds to the Kent Design Guide and Gravesham Design Code.

6.49 The proposals feature a central SUDs basin on the northern-most extent which creates a gateway feature to Hook Green along Longfield Road. The southern edge of built development will be lower density and outward facing with frontages providing natural surveillance of the open space and softening the development edge as it transitions to open countryside. The sites eastern edge includes the retained PRoW which will be set within a landscaped buffer and will provide access to the offsite PRoW at the southeastern corner of the site. The western and southern edges provide accessible open space which includes retained trees and hedgerows which will be supplemented by new planting that will help visually screen the development and offer glimpsed views of the new houses whilst promoting good placemaking, health, and well-being for existing Hook Green residents and new communities to the settlement.

6.50 New planting will include trees, hedges, shrub planting, climbers, bulbs and wild-flower. Some of the tree planting will create tree lined roads which add to the street scenes. New tree and hedgerow planting will include ornamental and native species to encourage wildlife and enhance biodiversity. The scheme will achieve a 10% net gain in biodiversity and a BNG Metric has been provided with the application submission.

- 6.51 The Illustrative Layout shows how a scheme could be accommodated with a range of housetypes including apartments and houses. The occasional use of an increase in storey height (up to 2.5 storeys) could be used where appropriate to aid legibility. A decrease in proposed height from a maximum of three storeys has been a result of the Design Review Panel feedback. The DAS includes details of the Design Coding and compliance with the Gravesham Design Code having regard to the feedback from the DRP. The Gravesham Design Code Compliance Checklist has been completed and is provided at Appendix A of the DAS.
- 6.52 The proposed access road is from Longfield Road. Pedestrian and cycle links are provided throughout, including a circular route within the site and links to existing footpaths in the nearby area, notably the PRoW to the southeast.
- 6.53 The usable open space provided onsite, as secured through the Parameter Plan, accords with the open space typology requirements set out in the Open Space Standards Paper and Policy CS13, as demonstrated at Table 4.1 above.

## **Housing Mix**

- 6.54 Whilst the application is made in outline, the Illustrative Masterplan within the DAS demonstrates that the site can deliver up to 120 homes with a mix of house types, tenures and sizes that broadly reflect the existing housing mix in Meopham and which responds to identified needs within the Meopham Rural Housing Needs Survey. The housing character of Meopham is principally comprised of owner occupied, medium sized and larger family housing.
- 6.55 Question 22 of the survey asks why residents need to move from their current home and what is required in a new home. The highest number of residents responded that they have a “need to set up an independent home” and “need a smaller home”. Question 24 also asks what type of household will the new household become, and 55 out of a total of 64 responses said a couple or two parent family.
- 6.56 The housing mix will be determined at a later reserved matters stage, although it is worth noting that the Illustrative Site Layout within the submitted DAS includes a mix of detached, semi-detached, terraced and apartment properties that will accommodate a range in dwelling sizes.
- 6.57 Affordable housing will be provided at a rate of 50%, which complies with the NPPF Golden Rules.
- 6.58 The scheme also allows for all of the new dwellings to meet M4(2) of the Building Regulations (accessible or adaptable dwellings) compliant. Furthermore, 10% of the affordable dwellings are shown to be built to meet M4(3) of the Building Regulations (wheelchair user dwellings).
- 6.59 The Illustrative Masterplan within the DAS includes a mix of house types including houses and maisonettes and is based on a Gravesham Borough Council rate of 70% affordable rent and 30% shared ownership. The affordable dwellings will also be spread across the site and designed to be indistinguishable from the open market properties.

6.60 The proposals are compliant with Policy CS14.

## **Flood Risk and Drainage**

6.61 A Flood Risk Assessment and Drainage Strategy have been prepared by MEC and are submitted with the application.

6.62 The Environment Agency Flood Map for Planning shows most of the site lies within flood zone (FZ) 1 and the site is at low risk of surface water flooding and a low risk of flooding from all other sources including groundwater and artificial sources.

6.63 The development will not increase flood risk to the wider area due to controlled surface water runoff and attenuated storage for up to a 1 in 100-year storm event with climate change allowance. Soil infiltration rate testing was undertaken by MEC in April 2025 to BRE365 standards and proved infiltration is a viable source of outfall. Surface water is proposed to be discharged into the ground through the provision of a soakage basin on the northern edge of the site. A total storage volume of 4,147.83m<sup>3</sup> will be available within the infiltration basin to allow sufficient time to infiltrate and cater for all storm events.

6.64 The development will incorporate Sustainable Drainage Systems to effectively manage water flow and quality. This is proposed to be in the form of a soakage basin with sufficient storage for the minimum requirement, alongside additional features such as permeable paving, swales and rain gardens. This can be finalised at detailed design stage.

6.65 Foul water will be discharged via a new pumping station to the public sewer in Longfield Road and the approach has been agreed with Southern Water.

6.66 The proposed development is in accordance with the NPPF and Policy CS18.

## **Highways and Accessibility**

6.67 The application is submitted with a Transport Assessment (TA) and Travel Plan (TP) prepared by Hub Transport Planning.

6.68 Vehicular access will be taken from Longfield Road on the northern boundary of the site via a single priority access. The proposed access will have a 5.5m carriageway width, a 6m kerbed radii, and 2.0m footways either side tying into existing footways on Longfield Road. It was confirmed by KCC during pre-application engagement that the proposed access arrangement is considered suitable given the scale of the proposals. The TA includes the proposed site access drawing (ref: T25526.001 Rev B) and a plan showing the highway extents.

6.69 Having regard to KCC pre-application advice, the location of the site access has been positioned 10m to the west of the access to no.32 Longfield Road.

6.70 The TA includes a swept path analysis of the access for both a refuse vehicle and fire tender (ref: T25526.002 Rev B).

6.71 Visibility splays from the access junction are provided within Drawing T25526.001 Rev C within the TA and have been informed by 85th percentile speeds recorded as part of a

seven-day Automatic Traffic Count (ATC) on Wrotham Road within the vicinity of the site access. The site is close to an existing change in vehicle speeds and so the TA proposes the following measures to manage speed close to the site access:

- An extension of the 30mph zone to the west of the site.
- Gateway entry feature such as dragon teeth markings or rumble strips in the 60mph speed zone to make drivers aware they are entering a lower speed limit zone.
- Vehicle activated speed signs within the 30mph zone to remind drivers if they exceed the speed limit.

6.72 With regard to pedestrian accessibility, the primary pedestrian access point is via the main vehicular access and tying into the surrounding footway network. The proposed development, as illustrated within the DAS, includes the retention of the PRoW on the eastern edge which will link to the PRoW route that traverses the northern edge of the fields towards Wrotham Road.

6.73 A dropped kerb crossing has been proposed south of the site access to allow for safe east/west pedestrian movements on Longfield Road. A dropped kerb crossover is also proposed adjacent the National Autistic Society Helen Allison School to allow pedestrians to access the wider footways on the northern side of Longfield Road which are generally c.2.0m. This arrangement also allows for pedestrians to avoid the vehicles parked partially on the southern kerbside which further reduces the working width of the footway.

6.74 The TA also refers to the attempts to engage with the school to understand its operation and how an area of on-site parking could accommodate their parking requirements, including a potential pedestrian access between the on-site parking and the school.

6.75 The TA includes further detail on parking provision to be secured at a future reserved matters stage and incorporate electric vehicle charging points and cycle parking facilities.

6.76 The following mitigation measures are proposed to assist with and potentially encourage active and sustainable travel:

- A 2.0m shared footway along the majority of the site frontage with tactile paving at the access crossing point.
- Contributions towards cycle parking capacity and infrastructure improvements are proposed at Meopham railway station to make cycling a more attractive method of travel to the station.

6.77 The TP also identifies measures to promote the uptake of sustainable transport modes such as:

- Car Club (including one year's free membership for residents and driving credit to encourage take up).
- Public transport seasons tickets.
- Parcel lockers (drop-off/pick-up).

- Public transport timetable and route information.
- Active Travel events and promotion.

6.78 The proposed development is forecast to generate 62 two-way vehicle trips in the AM and PM peak hour. Initial modelling of the access indicates that the proposed site access will operate with spare capacity in a future 2030 assumed opening year, and 2039 local plan year, along with minimal queuing and delay. KCC Highways have requested the use of the Kent Transport Model/Gravesham Transport Model to distribute traffic through the local highway network. Following this, local junction modelling will be undertaken of junctions that could be affected by the proposed development traffic. This modelling work will be provided within a subsequent Transport Assessment Addendum.

6.79 The proposed development is in accordance with the NPPF, KCC Local Transport Plan, KCC Design Guide, KCC Parking Standards and Policy CS11 of the Gravesham Local Plan.

## **Landscape and Visual Impact**

6.80 A Landscape and Visual Impact Appraisal (LVIA) has been prepared by Tyler Grange and is submitted with the application.

6.81 The Site is located approximately 800 metres west of the Kent Downs National Landscape, formerly designated as an Area of Outstanding Natural Beauty (AONB). The physical separation between the Site and the Kent Downs National Landscape includes the settlement of Hook Green (Meopham) and large educational facilities, which contribute to physical and visual separation between the Site and National Landscape. The Site itself is not subject to any landscape designations. The Site also lies within the London Area Green Belt.

6.82 The LVIA confirms that at Year 1, the maximum level of landscape effect is judged to be Major/Moderate adverse at the Site level, reducing to Minor adverse on the surrounding landscape. By Year 15, following the establishment of mitigation planting and green infrastructure, the maximum level of landscape effect reduces to Moderate adverse at the Site level, and Negligible adverse on the wider landscape.

6.83 Visual effects are greatest for users of PRoW NS253, which crosses the Site, where views result in Major/Moderate adverse effects, however, by Year 15 the establishment of structural planting along site boundaries reduces visibility from nearby PRoW's.

6.84 The proposed development has been informed by a landscape-led design rationale, with the built development parcels shaped around existing landscape features and supported by a comprehensive green infrastructure strategy. This includes an area of informal public open space along the southern boundary to create a softer transition to the adjoining countryside, retention and enhancement of existing hedgerows, and new structural planting along the southern and eastern edges. Internally tree-lined streets are proposed to break up built form and reinforce connectivity, with SuDS feature present along the northern boundary to form a focal point. These measures have been designed to respond to the management guidelines of the Meopham Downs LCA and align with Policy CS12 (Green Infrastructure) and Policy CS19 (Development and Design Principles) of the

Gravesham Local Plan Core Strategy as well as delivering a scheme that supports the long-term resilience and quality of the local landscape.

- 6.85 The LVIA concludes that the development is considered acceptable in landscape and visual terms.
- 6.86 This assessment concludes that the Site makes no contribution to Purpose A (checking sprawl), no contribution to Purpose B (preventing towns merging), and no contribution to Purpose D (historic towns). It makes a moderate contribution to Purpose C (safeguarding the countryside from encroachment), reflecting its current undeveloped state and transitional location between settlement and countryside. The Site is physically and visually contained on three sides, and the proposed development includes a landscape-led southern boundary with POS and structural planting, reinforcing containment and preventing further encroachment.
- 6.87 Having regard to the above section of this Statement on Grey Belt eligibility, the LVIA Green Belt Assessment helps demonstrate that the Site meets the definition of Grey Belt under the updated NPPF and PPG, and that development here would not be regarded as inappropriate.
- 6.88 The proposed development is in accordance with Policy CS12 and CS19.

## **Archaeology and Built Heritage**

- 6.89 A Heritage Statement and Archaeological Desk-Based Assessment has been prepared by Pegasus and is submitted with the application.
- 6.90 The Assessment confirms that there are no designated heritages located within the boundaries of the Site and within a 1km study area, there are 16 Listed Buildings and two Conservation Areas, including Meopham The Street. There are no Scheduled Monuments, Registered Park and Gardens or any other designated heritage assets located within 1km of the site.
- 6.91 The Assessment concludes that the following heritage assets have the potential to be sensitive to the development proposals; Meopham The Street Conservation Area and the Grade I Listed Parish Church of St John the Baptist (Listing ref: 1039866).
- 6.92 Meopham The Street Conservation Area encompasses the original settlement of Meopham and today has the outlying satellites of Hook Green and Meopham Green to the north and south. All three occur now as 'incidents' along the A227 (Wrotham Road). The positioning of the Grade I Listed Parish Church and the Manor House at Meopham Court, as well as their relationship to one another, were key elements of the original village.
- 6.93 The site is located approximately 325m northwest of the Meopham The Street Conservation Area, with intervening agricultural land and treelines providing a degree of physical and visual separation. When exiting the site via the PRoW in the north east corner, views towards the Conservation Area are largely obscured by intervening vegetation. However, filtered glimpses of the Church tower are occasionally visible and views are significantly reduced during summertime when trees are in full leaf. These views

are not considered to strongly contribute to the Church's role as a local waymarker and are not considered to contribute to the overall understanding and experience of the Conservation Area.

6.94 The Grade I Listed Church of St John the Baptist is located approximately 545m to the southeast of the site. The Church is surrounded on all sides by its associated churchyard, where the asset can be best experienced. The churchyard is enclosed by mature vegetation on its northeastern, eastern and southern sides; although, the western side remains relatively open, allowing views of the Church from Wrotham Road. A modern cemetery lies to the west of the Church on the western side of Wrotham Road.

6.95 The Church was not built to take advantage of any view from within it and the tower was not designed to be a viewing platform, with the tower lights being louvred and serving the bells. Furthermore, the grounds of the church have been lined with mature tree planting on its northern side and the wider surrounds is characterised with further tree planting and additional built form. Therefore, there is no ability to see the Site from within the Church or its immediate grounds.

6.96 Within the Site, visibility of the Church is limited to filtered glimpses through the existing vegetation which surrounds the asset. Seasonal site visits confirm that such views are significantly diminished when trees are in full leaf. Therefore, the limited visual relationship between the Site and the Church is not considered to positively contribute to the overall understanding or experience of the asset.

6.97 The Heritage Assessment includes an assessment of impacts at Section 7 and includes reference to the design and layout parameters that will ensure the proposed development has less than substantial harm which is characterised as low to moderate. Paragraph 7.12 of the Heritage Assessment concludes:

*"Whilst the proposed development will not be perceptible from within the Conservation Area, it is recognised that the proposals will result in change to the character and appearance of the Site through residential development. When leaving the Conservation Area along Wrotham Road, there may be glimpses of the development looking across the intervening rural land to the west, although this will be significantly obscured by existing intervening vegetation and new structured vegetation which will be planted at the southeastern edges of the Site. The visibility of development in such views will not harm the heritage significance of the asset, considering the existing physical and visual separation between the Site and the Conservation Area."*

6.98 It is also concluded that the proposed development will cause no harm to the heritage significance of the Listed Building through changes to its setting.

6.99 In regard to archaeology, no anomalies suggestive of significant archaeological remains of prehistoric date or Romano-British date were recorded during the geophysical survey across the Site. Settlement activity dating from the late Neolithic to the early Romano-British periods was recorded some distance to the south of the Site. However, other instances of prehistoric archaeology recorded within the study area is limited to small surface or sub surface finds. Therefore, the potential for significant prehistoric archaeology within the Site is considered low.

6.100 No anomalies suggestive of significant archaeological remains of medieval date were recorded during the geophysical survey across the Site. Settlement activity within the wider study area appears to have increased during the early-medieval, medieval and late-medieval periods, as indicated by the presence of medieval built form recorded by the HER. During this time, the Site likely formed part of the wider rural landscape of these settlements, potentially being utilised for agricultural purposes. The presence of settlement activity within the Site from this period is unlikely, although, evidence of agricultural field systems may be present.

6.101 Based on the Tithe apportionment, it is understood that the Site formed part of the agricultural operations of Hook Green Farmhouse during the 19th century. The Site has remained in agricultural use, mainly as arable land. There is no other evidence to suggest any built form was present within the Site during the modern period; any other archaeology would most likely be associated with the agricultural activity, and any such remains would be unlikely to be regarded as heritage assets.

6.102 The proposed development is therefore in accordance with Policy CS20, TC3 and TC7.

## Ecology

6.103 A Preliminary Ecological Appraisal Report has been prepared by Ramm Sanderson and is submitted with the planning application. An Ecological Impact Assessment (EclA) is being prepared and will be submitted to the Council during the early stages of determination.

6.104 The site is comprised of mostly cropland habitat with modified grassland strips at the western edge. Hedgerows and trees on the western boundary provide suitable commuting and foraging opportunities for terrestrial mammals and bats and commuting and refuge opportunities for amphibians and reptiles and nesting habitat for birds. There is also a small patch of woodland beyond the south eastern site boundary which offers suitable roosting and foraging opportunities.

6.105 Within the Site, habitats are noted as being generally common and widespread with limited floral diversity, subject to an intense management regime due to the agricultural nature of the Site. Although much of these areas will be subject to modification as part of the proposed Scheme, the Site has opportunities for habitat creation and enhancement.

6.106 The site investigation includes evidence of badger presence within the vicinity of the site and it is considered likely that badgers are utilising the site itself. Mitigation measures have been proposed during construction and a badger survey has been undertaken within a 30m radius of the site to locate existing Setts.

6.107 The open cropland is deemed to be of negligible bat foraging suitability. Moderate suitability commuting features were present on the site boundaries, including hedgerows on the western boundary and the small parcel of woodland beyond the south east corner of the site, which also connects to other higher value features within the wider landscape. Whilst these features are to be retained, further bat surveys, including a ground level tree assessment, bat crossing point survey and bat activity survey, have been undertaken and will be reported on within an EclA.

6.108 There are no features within the site that could support Great Crested Newts and there are two waterbodies within 250m of the site. Construction related mitigation measures have been proposed to adopt a Precautionary Method of Work or CEMP to limit risk to transiting newts and common reptiles.

6.109 Wintering bird surveys have been undertaken, confirming skylarks were identified during one visit and the site was noted for its suitability for ground nesting birds. Further breeding bird surveys have been undertaken during the spring/summer period and the results will be reported within an EclA.

6.110 Habitats on site are suitable for hazel dormouse, particularly at the site edges. Due to the prevalence of hazel dormouse in Kent, further surveys have been completed to confirm their presence on site. The results of the survey will be reported within the EclA.

6.111 There are no records or field survey evidence of otter, water vole, aquatic invertebrates or fish. The site holds suitability for other notable species, such as hedgehogs and common toads and therefore a precautionary approach to construction works is recommended to limit the risk to individuals utilising the Site for foraging, commuting or sheltering.

6.112 The scheme will deliver a 10% net gain in biodiversity.

6.113 The proposed scheme is in accordance with Policy CS12.

## **Arboriculture**

6.114 A Tree Survey: Arboricultural Impact Assessment, Method Statement and Tree Protection Plan has been prepared by Ramm Sanderson and are submitted with the application.

6.115 The AIA confirms that the principal concentration of arboricultural features are located along the western site boundary, with a further moderate quality (Category B) group of trees providing screening to the adjacent school to the east. The majority of trees surveyed however were of low quality (Category C).

6.116 There are no Tree Preservation Orders on site and the site is not within a Conservation Area so there is no statutory protection in this location.

6.117 The Tree Survey assessed 19 individual trees, 2 groups of trees, 2 areas of woodland and 1 length of hedgerow. All of the individual trees, 1 group of trees and the hedgerow surveyed were of low arboricultural quality (Category C). The remaining group of trees were deemed to be of moderate arboricultural quality (Category B) as they displayed good amenity and landscape value.

6.118 The proposed development does not require the removal of any trees, groups, hedgerows or areas of woodland and therefore there is to be no arboricultural impact from the development.

6.119 The proposed development offers an opportunity to manage the existing tree resource and to plant new trees and hedgerows which will increase the species diversity of the tree

stock and enhance its biodiversity value whilst also making the long-term future of the trees more secure by increasing climate change and disease resilience.

- 6.120 The installation of a three-dimensional cellular confinement system for the construction of a proposed footpath is required within the root protection area (RPA) of T1. Proposed footpaths also encroach within the RPA's of T5, T7 and G2, however no mitigation measures are required in these instances due to the minor impacts. A minor section of footpath is also proposed within the RPA of high-quality woodland (W2), this footpath is to be laid with gravel or similar, with no excavation permitted.
- 6.121 The Tree Survey includes a number of mitigation and protection measures for the retained trees during construction that can be secured by condition.
- 6.122 The proposed development is in accordance with Policy CS12.

## Air Quality

- 6.123 An Air Quality Assessment prepared by MEC is submitted with the application.
- 6.124 The Air Quality Assessment examines the impact of local road traffic emissions upon existing receptors adjacent to local roads, and future sensitive receptors on the Site. The key traffic related pollutants considered are nitrogen dioxide (NO2) and particulate matter. The Assessment also includes a Construction Dust Risk Assessment.
- 6.125 The results of the assessment indicate that annual mean NO2 and particulate matter concentrations are predicted to remain below the annual mean objective following the development at the Site. The impact of the development on local air quality through additional vehicle movements is defined as 'Negligible'.
- 6.126 The Assessment concludes that the air quality at the Site is acceptable for the proposed development and that development traffic will not lead to a significant adverse impact.
- 6.127 There are three Air Quality Management Areas in Gravesham which are located over 4km from the application site. The proposed dwellings will satisfy all air quality objectives of the Borough.
- 6.128 Mitigation measures have been proposed to minimise the potential effects associated with increased air pollutant concentrations including the provision of electric vehicle charging points, low NOx boilers and measures to promote sustainable and active travel.
- 6.129 Standard construction dust related mitigation measures are also recommended and can be secured by condition.
- 6.130 The proposed development is in accordance with Policy CS18.

## Noise

- 6.131 An Acoustic and Vibration Assessment prepared by MEC is submitted with the application.

6.132 The Assessment provides details of the Sound Survey undertaken within the vicinity of the Site to determine prevailing acoustic conditions. The Assessment has been completed using relevant criteria contained within ProPG, BS8233, AVOG whilst giving consideration to typical condition ventilation requirements in AD-F. The main noise sources are from transportation using Longfield Road, coupled with any noise contributions from the adjacent Helen Allison School.

6.133 Acoustic modelling has demonstrated that the BS 8233 and ProPG requirement can be satisfied across most of the site through the use of standard double glazing and direct airpath window mounted trickle ventilators. Uprated acoustic glazing and acoustically rated wall trickle ventilators are required for the most exposed plots overlooking Longfield Road. The implementation of the proposed mitigation measures can be secured by condition and addressed at detailed design stage.

6.134 Acoustic modelling has demonstrated that BS 8233's lower-level criterion of 50 dB LAeq,16hr, will be satisfied at all garden locations on the Site with a carefully designed layout and standard 1.8m high close boarded timber fencing without the need for any additional mitigation.

6.135 The proposals therefore comply with Policy CS19 and the relevant paragraphs of the NPPF.

## **Ground Conditions**

6.136 A Phase I Geo-Environmental Desk Study prepared by MEC is submitted with the application.

6.137 The site is not located within a Mineral Safeguarding Area as defined within the Kent Minerals and Waste Local Plan 2024-2039.

6.138 The Study identifies low pollutant risk on the Site, but low to moderate locally due to potential migration of contamination from historical off-site brick works and associated kilns and infilled pits, as well as ground gas generated from infilled pits in the surrounding area.

6.139 It is not anticipated that extensive remediation will be required for the proposed development, although the Site may locally be affected by ground gases, predominantly along the southern boundary, and protection measures may be required for specific plots. A Phase II Intrusive Ground Investigation is recommended and can be secured via condition.

6.140 The intrusive ground investigation will determine if the underlying geology will provide competent bearing strata for foundation design. The site is located in a moderate-risk area of subsidence due to potential ground dissolution associated with the Chalk bedrock, potentially requiring alternative foundation designs such as rafts or piling.

6.141 The proposals therefore comply with Policy CS19 and the relevant paragraphs of the NPPF.

## **Utilities**

- 6.142 A Utilities Assessment prepared by MEC is submitted with the application.
- 6.143 The Utilities Assessment confirms that there is sufficient capacity within the existing gas network for the proposed development and that the site can be connected to the existing electricity HV network. Costs associated with these connections are provided in the Assessment.
- 6.144 Southern Water confirmed the nearest feasible point of connection is the 225mm diameter foul sewer located at Manhole MH2712 within Longfield Road, although there is insufficient capacity to accommodate additional flows, and as such, off-site improvement works would be required and will be delivered by Southern Water.
- 6.145 Southern Water have confirmed that there is insufficient capacity within the existing clean water network to adequately supply the proposed development and reinforcement works will be required to support additional demand. A Point of Connection assessment will be undertaken at the relevant stage to ensure the provision of the supply.
- 6.146 Openreach have confirmed that Fibre will be deployed to all premises.
- 6.147 Further details of infrastructure connections and diversions will be provided at a later reserved matters stage, although the Utilities Assessment confirms that required infrastructure connections can be achieved to serve the development at the Site.

## **Energy**

- 6.148 An Energy Statement has been prepared by Focus.
- 6.149 The statement highlights that the proposed development will adopt a thermal envelope which seeks to minimise heat loss, as well as efficient heating and lighting systems, which will drive energy efficiency in the proposed dwellings. This is in line with the Policy CS18 objective of promoting development which minimises carbon emissions and greenhouse gas emissions.
- 6.150 The Statement confirms that there will be an underlying commitment to operating under sustainable construction practices and a future developer will demonstrate this through prioritising the selection of sustainably sourced materials, minimising waste and promoting recycling throughout construction and into operation, and reducing embodied carbon by adopting a circular approach throughout design and construction.
- 6.151 The proposals are compliant with Policy CS 18.

## **Circular Energy Statement**

- 6.152 In accordance with Policy CSW3 of the Kent Minerals and Waste Local Plan, details of materials and a Construction Management Plan will be submitted with a future reserved matters application and will include details of how construction methods will seek to minimise waste during site clearance and construction.

6.153 A future reserved matters application will also include details of how a residential development of the site will incorporate suitable facilities for the storage, collection and management of waste.

## **Summary**

6.154 The subject Site is available for development, suitable, sustainably located and development here would be achievable with the scheme being mostly completed within five years.

6.155 The Site is an emerging residential allocation (GB117) and whilst currently in the Green Belt, it has been demonstrated that the site is grey belt and therefore development should not be regarded as inappropriate having regard to the NPPF's 'Golden Rules'. Whilst in outline, the application demonstrates how a scheme of 120 dwellings could be brought forward at the site that is compliant with adopted Gravesham Borough Council Policy. Moreover, there are no known technical constraints or viability issues, and any scheme would provide a policy compliant suite of planning obligations

## 7. Affordable Housing Statement

### Adopted Policy

- 7.1 Adopted Policy CS16 confirms that affordable housing is to be provided on proposals for 3 dwellings or more in the rural area at a rate of 35%. GBC will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.
- 7.2 Paragraph 156 and 157 of the NPPF confirm that where major residential development is proposed on sites in the Green Belt the affordable housing contribution required to satisfy the 'Golden Rules' is 15 percentage points above the highest existing affordable housing requirement that would otherwise apply to the development, subject to a cap of 50%.
- 7.3 Therefore, the affordable housing requirement for the application site is 50%.

### Pre-Application Discussions

- 7.4 Affordable housing was addressed at the pre-application meeting, and it was agreed that the NPPF 'Golden Rules' apply to this site and therefore affordable housing would need to be provided at a rate of 50%.
- 7.5 The applicant requested information regarding affordable housing mix and the Officer confirmed this would be provided in the written pre-application response.
- 7.6 The written pre-application response had not been received at the time of submission of the application.

### Proposed Affordable Housing Provision

- 7.7 In accordance with the NPPF, the application proposals make provision for 50% onsite affordable housing. Whilst the current application is made in outline, and the Illustrative Masterplan has been designed to accommodate the tenure split of 30% shared ownership and 70% affordable rent, as required by Policy CS16, the tenure split of the affordable dwellings will be agreed with the Council during the course of the application. The final mix of affordable housing will be determined at Reserved Matters stage, reflective of the most up-to-date identified needs.
- 7.8 The application proposals in respect of affordable housing provision comply with the relevant adopted policies and other material planning considerations. The provision of affordable housing is a clear benefit of the proposed development and should be afforded significant weight. It is proposed that the on-site affordable housing provision can be secured by way of a Section 106 legal agreement.

## 8. Draft Heads of Terms

- 8.1 The applicant will enter into constructive dialogue with GBC in order to agree a Section 106 Agreement for any obligations which, in accordance with the CIL Regulations (2010) (as amended) are necessary, directly related to the development and fairly related in scale and kind to the development.
- 8.2 The following initial Heads of Terms are suggested and reflect the GBC pre-application response:

### **Affordable Housing**

- 8.3 Provision of 50% affordable housing with a tenure split to be agreed with GBC.

### **Education**

- 8.4 Primary and secondary education and early years and childcare provision as required by the Local Education Authority having regard to existing capacities.

### **Infrastructure**

- 8.5 Healthcare provision as required by the NHS/CCG.

## 9. Conclusion

- 9.1 This Planning Statement has been prepared in support of an outline application for the demolition of existing buildings and erection of up to 120 dwellings (Use Class C3) with all other matters reserved except for the point access off Longfield Road. The application is submitted on behalf of Richborough.
- 9.2 Richborough is a privately owned land promotion company operating nationally. They work in partnership with landowners, councils and stakeholders to secure residential planning permission on suitable sites, which are then delivered by an appropriate partner.

### **Case for Development**

- 9.3 This statement demonstrates that the proposals respond positively to the adopted Development Plan policies as well as those other material considerations identified. Where a conflict arises, those policies should be afforded limited weight due to inconsistency with the NPPF and the lack of clear evidence that the necessary level of housing will be delivered in the future. In accordance with paragraph 11d of the NPPF, the tilted balance is engaged, and permission should be granted without delay.
- 9.4 There are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations.
- 9.5 The proposal is in accordance with the broad spatial strategy set out in Policy CS02, which supports proposals in the Green Belt and rural area where they accord with national policy on Green Belt. It has been demonstrated that the site comprises grey belt in line with the updated NPPF definition. In this regard:
  - Hook Green is a village and not a 'large built up area', meaning that the Site cannot contribute strongly to Purpose A of Green Belt. In any event, the development would not result in an incongruous pattern, given the existing development on the adjacent side of Longfield Road and to the immediate east. The contribution of the site to Purpose A cannot be considered to be strong.
  - Hook Green is a village and is not considered a town or historic town and therefore cannot be considered to contribute strongly to Purposes B or D.
  - The application does not fall within a protected landscape or national ecology designation. The site is within Flood Zone 1. Sensitive design and buffer planting can minimise any impact on the National Landscape beyond agricultural fields to the east of the site. This buffer planting can be controlled by the submitted Parameter Plan.
- 9.6 The site is also identified as a draft allocation in the emerging Local Plan. This demonstrates that the Council consider the site to be suitable for residential development and capable of delivering 120 dwellings.
- 9.7 It is the intention to deliver housing quickly on the site with all of the 120 dwellings being completed within the five year monitoring period. Upon completion, the Site will include the delivery of 60 affordable dwellings.

- 9.8 The design concept outlined in the Design and Access Statement, alongside the submitted parameter plan would secure a high-quality development.
- 9.9 The development of the site would be both suitable and sustainable.

### **Benefits**

- 9.10 Subject to planning permission being granted, there are numerous socio-economic and environmental benefits which would arise from the proposed development. These benefits are established throughout this Statement and can be summarised as:
  - The provision of new high quality market housing in a sustainable location in an area where the claimed level of deliverable supply is only three years;
  - The provision of a 50% level of affordable housing in an area where there is evidence of a historic shortfall of affordable housing delivery and significant unmet need;
  - The provision of smaller housing for which there is an identified need within the Meopham Rural Housing Needs Survey. This will increase opportunities for under-occupied housing to be made available to younger families;
  - Opportunity to enhance sustainable modes of transport through the provision of pedestrian infrastructure improvement, and traffic calming measures that improve the existing pedestrian environment around the schools on Longfield Road;
  - The scheme would deliver formal/informal greenspace and play space at a rate that well exceeds requirements and will be for use by new and existing residents with long-term management secured;
  - The retention of existing ecological habitats. The ecology of the site will be improved through the provision of new green infrastructure which will achieve a 10% net gain in biodiversity;
  - Creation of employment opportunities through the construction phase of the development;
  - The proposed development will increase the number of economically active residents, boosting income and local expenditure.
- 9.11 The range of benefits are substantial in nature and should be given significant weight at the top end of the scale within the planning balance.

### **Harm/Balance**

- 9.12 Paragraph 11(d) of the NPPF explains that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Particular regard should be had to key policies for directing development to sustainable locations, making effective use of land,

securing well-designed places and providing affordable homes, individually or in combination.

9.13 This comprises the tilted balance to the presumption in favour of sustainable development, which is triggered because the most important policies for the determination are out of date.

9.14 It is accepted that through the construction and delivery of the proposals, there will be some localised harms:

- Visual impacts arising from construction will be temporary. The site is a greenfield site, and it is accepted that the proposals will inevitably result in a change of the character of the site despite complying with development plan and national policy on landscape.
- It is accepted that there will be impacts arising from construction vehicles and traffic which will be temporary. It is inevitable that there will be traffic movements generated by the proposals, and those expected are set out in the TA, and it is not considered that there are any unacceptable or severe highway impacts arising from the scheme.

9.15 As with any site located on the edge of a settlement, urbanising development may introduce changes to the area. However, the submitted LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts. When considering landscape impacts, it is important to bear in mind that GBC is reliant on greenfield development to meet its housing needs going forward. Any greenfield development will have some landscape impacts, and the limited, highly localised impacts of the scheme, identified within the LVIA, must be considered in that context.

9.16 In relation to other matters set out in section 6 of this Statement, such as trees, noise, highways and traffic, air quality, flood risk and drainage, and ground conditions, it is considered that the proposed development has been demonstrated to be acceptable, in accordance with the development plan and the NPPF.

9.17 In conclusion, the adverse impacts do not significantly and demonstrably outweigh the benefits of the scheme when assessed against the provisions of the NPPF as a whole and planning permission should be granted as set out in paragraph 11d) of the NPPF.

9.18 It is clear that the proposals represent sustainable development which will make a positive difference, creating an appealing well-designed neighbourhood, including affordable homes, which respects its context and caters for identified needs. Taking the above into consideration, there is a compelling case for the granting of planning permission at the earliest opportunity.