

**Land North of The Drove Way,
Istead Rise, Gravesham**

On behalf of Ptarmigan Lane A Ltd

Planning Statement

June 2026

tor
&co

Contents

- 1. Introduction**
- 2. Site context and background**
- 3. Statement of community involvement**
- 4. Proposed development**
- 5. Decision making framework**
- 6. Principle of development**
- 7. Technical considerations**
- 8. Planning balance**
- 9. Conclusions**

Appendix A – Consultation Material

1. Introduction

- 1.1 This Planning Statement has been prepared by tor&co on behalf of Ptarmigan Land A Ltd ('the Applicant') in support of an outline planning application for development of land located to the north of The Drove Way, Istead Rise, Kent ('the site'). The description of the development is:

Development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).

- 1.2 The proposed development presents an excellent opportunity to significantly contribute towards the current housing shortfall in Gravesham, by bringing forward up to 100 new homes, including up to 50 affordable homes, that the area desperately needs. The proposal comes forward on a site that has been identified by Gravesham Borough Council (GBC) as being available and developable with few constraints, leading to a draft housing allocation.
- 1.3 The application site is located to the north of Istead Rise village. It is in a sustainable location close to local services, schools, public transport and the A2 to the north which forms part of the strategic road network. The site benefits from excellent accessibility and represents a logical and well-related extension to the existing village. It can deliver up to 100 new homes, 50% of which will be affordable.
- 1.4 This Statement explains the site context and planning background, sets out the relevant decision-making framework, and demonstrates that the proposed development represents sustainable development for which planning permission should be given substantial weight and granted planning permission.
- 1.5 The documents submitted in support of the application demonstrate the sustainability and suitability of the site for the development. They explain the design rationale and how technical matters have been assessed and will be mitigated. They are:

Plans Submitted for Approval

- Parameter Plan (ref: 1509-004 Rev D)
- Proposed Access Arrangement (ref: 25-305-T-002-A)

Documents submitted in support

- Planning Statement (including Statement of Community Involvement, Affordable Housing Statement and Draft Heads of Terms)
- Design and Access Statement
- Ecological Impact Assessment
- Habitats Regulations Assessment Screening Report
- Bat Report
- Badger Report
- Breeding Bird Report
- Biodiversity Net Gain Assessment
- Tree Survey and Arboricultural Impact Assessment
- Energy and Sustainability Statement

- Flood Risk Assessment and Drainage Strategy
- Utilities Report
- Historic Environment Desk Based Assessment
- Landscape Visual Impact Assessment
- Grey Belt Appraisal
- Transport Assessment
- Travel Plan
- Land Contamination Phase 1 Desk Study
- Noise Assessment
- Air Quality Assessment
- Socio-Economic Benefits Statement
- Housing Land Supply Review Report

2. Site Context and Background

- 2.1 The application site comprises 5.7 hectares of agricultural land to the north of The Drove Way, including all land necessary for access (see Figure 2.1 below).



Figure 2.1: Site Location Plan

- 2.2 The site is well-contained with mature vegetation and hedgerows to the north, east and west, and a small area of woodland to the south west corner. Immediately to the south of the site, there is existing residential development comprising the built-up area of Istead Rise.
- 2.3 There are overhead power lines to the north-eastern corner of the site and an underground high-pressure gas main. Advice on this has been sought from the Health and Safety Executive (HSE). HSE have confirmed they have no objection to the location of land uses proposed, and the proposal can accommodate their requirements while still fitting around 100 homes on the site.

Surrounding Area

- 2.4 The site is in a sustainable location on the edge of the village of Istead Rise and within a 20-minute walking distance of a variety of amenities as set out at Section 3.4 of the supporting Transport Assessment. These include:

Retail

- Co-Op Food - Gravesend - Istead Rise (8-minute walk/2-minute cycle)
- Istead Rise Post Office (The Parade) (8-minute walk/2-minute cycle)

Recreation and Leisure

- Istead Rise Recreation Ground (5-minute walk/2-minute cycle)
- Istead Rise Community Centre (5-minute walk/2-minute cycle)

Education & Childcare

- Istead Rise Primary School (11-minute walk/3-minute cycle)
- Kiddiecare Kindergarten (11-minute walk/3-minute cycle)

Health

- Istead Rise Pharmacy (8-minute walk/2-minute cycle)
- Downs Way Medical Centre (6-minute walk/2-minute cycle)

- 2.5 In terms of public transport connections, there are two bus stops within a 10-minute walk: one on Flowerhill Way (Littlecroft), approximately 450m to the southwest, and another at the Istead Rise shops, approximately 700m to the south.
- 2.6 The 308-bus route provides services between Sevenoaks and Gravesend town centre, and also connects directly to the nearest rail station, Meopham Station, which is approximately a 15-minute bus journey from the site. Meopham Station is also easily accessible by other means, being an 11-minute cycle or a 4-minute drive away.
- 2.7 The station offers frequent and well-connected rail services to London Victoria, with a journey time of approximately 33 minutes and two trains per hour, making it a realistic and convenient commuting option for future residents. It also provides onward connections to Chatham, Rochester, Gillingham, and beyond.

Designations

- 2.8 The site lies within the Gravesham Green Belt as designated within the adopted Gravesham Local Plan Core Strategy (2014), the Istead Arable Farmlands Landscape Character Area and an area of medium-low landscape sensitivity.
- 2.9 The site is located within Flood Zone 1 and is at very low risk of flooding from all sources.
- 2.10 There are no statutory ecological designations within or immediately adjoining the site. The nearest heritage asset is Downs Hall (Grade II Listed) which is located on the opposite of Istead Rise along Downs Road.

Planning History

- 2.11 A full planning history search of the application site has been carried out using GBC's online planning register. There is no planning history on the site relevant to the application proposal.

Planning Status

- 2.12 The southern part of the site was identified as a draft site allocation (GB62) within the Council's Site Allocations and Development Management Policies Document Regulation 18 Consultation in December 2020 (Stage 2). The stated capacity is 75 residential dwellings. The site was identified as being a 'developable site' within the Strategic Land Availability Assessment (2020) which informed the draft allocation.

- 2.13 This draft allocation was also supported by the Stage 2 Green Belt Assessment (August 2020) which included this site (Ref IR4). There have been no updates to this Green Belt evidence base which has been published by GBC.
- 2.14 It had been anticipated that the draft allocation would be carried through to the Regulation 19 version of the draft local plan. However, a Proposed Submission Draft (Regulation 19) was published for consultation on 17 April 2026 which does not include the site as a site allocation. No justification has been given concerning the reason why the previous draft allocation (GB62) on the site has not been carried forward, despite the Green Belt evidence base remaining unchanged and the site performing less against Green Belt functions than other draft allocation sites which have come forwards.
- 2.15 An updated Strategic Housing Land Availability Assessment (SHLAA) was published in April 2026 as part of the Regulation 19 evidence base. The site (GB62) is identified as being available and achievable for development. In terms of suitability, the SHLAA concludes that the site is suitable for development subject to ecological and landscape mitigation and addressing the site's utility constraints. As confirmed at Section 7 of this Statement, the supporting technical reports demonstrate that there are no ecological, landscape or utilities constraints that would prevent the site being developed, and any necessary mitigation can be appropriately secured and delivered.
- 2.16 The Council can only demonstrate a 3-year supply of housing¹, and the housing delivery test score fell below 75% in the most recent calculation². The Council's latest housing land supply calculation is based on data that is now two years old and cannot be regarded as up to date. Accordingly, the Housing Land Supply Review Report prepared by Iceni Projects and submitted alongside this application provides an updated assessment of the supply position using the most recent available evidence, with a base date of 1 April 2026. The Report concludes that GBC can currently demonstrate a deliverable housing land supply of 1.2 years.
- 2.17 Plan examination is estimated to take place in public hearings in spring 2027, with the plan being adopted in 18 months at the earliest.
- 2.18 Given this position, the development management process is the only tool through which the Council can meet identified housing needs.
- 2.19 The National Planning Policy Framework (NPPF) provides support for the release of the site from the Green Belt through the development management process, recognising the role of grey belt land in delivering sustainable development to meet identified need.
- 2.20 However, and in any event, it is considered that very special circumstances exist, given the acute housing crisis, housing need and ability of this site to deliver housing within a short period of time in a sustainable location to help meet those needs.
- 2.21 As explained further below (section 8) the development proposed meets these requirements for 'not inappropriate' development, and planning permission should be granted under the presumption in favour of granting planning permission for sustainable development (NPPF para 11 d) ii – the 'tilted planning balance').

¹ Gravesham Five Year Housing Land Supply Statement (2024-2029), published February 2025

² Housing Delivery Test, 2023 Measurement

3. Statement of Community Involvement

- 3.1 An integral part of the planning process is engaging with the local communities and stakeholders. The National Planning Policy Framework (NPPF) encourages early engagement to improve the efficiency and effectiveness of the planning application system.
- 3.2 The Applicant recognises community involvement as an important part of the planning application process and seeks to ensure that the consultation approach adopted during the pre-application stage is consistent with the local and national guidelines. Relevant planning policy and guidance have been reviewed and taken into account in the evolution of the proposals.
- 3.3 A request for pre-application advice was submitted to the Local Planning Authority in February 2026 in relation to proposals for residential development of up to 100 dwellings on the site. At the time of submission of this application, a formal response is still awaited.
- 3.4 A request for pre-application advice was also submitted to Kent County Council (KCC) Highways in April 2026. At the time of submission, a formal response is still awaited.
- 3.5 In terms of community engagement, a letter including details of the proposed masterplan was distributed to approximately 630 residential addresses within the local area to seek feedback on the emerging proposals. An extract of the consultation material is appended at Appendix A.
- 3.6 The consultation material outlined proposals for approximately 100 new homes, including 50% affordable housing, new access arrangements from The Drove Way, pedestrian and cycle connectivity improvements, and enhancements to existing woodland and informal footpaths. Residents were invited to provide comments or raise questions via a dedicated email address or by writing directly to the applicant team.
- 3.7 A total of 18 responses have been received at the time of submission.
- 3.8 The comments received primarily relate to the principle of development in this location, concerns regarding the capacity of existing infrastructure, potential traffic and highway impacts, and the effect of the development on the character of the area and the surrounding countryside.
- 3.9 Additional matters raised included the proposed housing mix, ecological considerations, and the potential impacts associated with the construction phase.
- 3.10 The feedback received through the consultation process has been reviewed and taken into consideration in informing the submitted masterplan and proposals.
- 3.11 The submitted technical reports consider matters relating to transport and highways, landscape and visual effects, ecology, infrastructure provision, and other planning considerations relevant to the proposed development.
- 3.12 The submitted Transport Assessment includes an analysis of the number of additional trips the proposed development would create as well as modelling of key junctions to evaluate development impacts on local road network capacity. The findings demonstrate that traffic impact of the proposed development can be

suitably accommodated on the local highway network with no severe highway impacts.

- 3.13 The submitted LVIA assesses potential effects of the proposed development on the landscape and visual receptors that have been identified, taking into account the primary mitigation measures, including the planting proposals designed to fit into and complement the local landscape and enhance the habitat structure and biodiversity.
- 3.14 The LVIA studies conclude that the effects on the wider landscape would be small or negligible and that any visual effects would be very localised.
- 3.15 An Ecological Impact Assessment (EclA) is submitted with the application, along with reports for badgers, bats and breeding birds. These reports identify any necessary mitigation measures to ensure that the proposed development does not adversely affect existing habitats and instead delivers habitat enhancements.
- 3.16 Habitat creation includes lowland mixed deciduous woodland, modified grassland (amenity grassland), other neutral grassland (wildflower meadow), traditional orchard, sustainable drainage systems, and 30no individual trees. Collectively, these measures will contribute towards habitat enhancement and improved ecological connectivity across the site.
- 3.17 As this is an outline application, the details of housing types and tenure mix will be confirmed at reserved matters stage. However, the proposed mix will be informed by identified local housing needs at that time.
- 3.18 Before any development commences on site, a Construction Management Plan will be required to be submitted and approved by the Local Planning Authority. This will set out the measures that will be implemented to manage construction activities and minimise disruption to surrounding residents and the local area during the construction period. Typically, this includes controls relating to construction traffic and access routes, hours of working, parking for contractors, deliveries, dust and noise management, site safety, and communication with local residents.
- 3.19 In terms of infrastructure capacity, as set out within section 7 of this Statement, it is envisaged that any increased demand for education and healthcare provision arising from the proposed development will, where necessary, be addressed through financial contributions secured by a Section 106 agreement, in line with the Council's Infrastructure Delivery Plan and Kent County Council's (2023) *Developer Contributions Guide*.

4. Proposed Development

- 4.1 The application is submitted in outline with all matters reserved, except for access. It is for residential-led development. The site can accommodate up to 100 market and affordable homes. An illustrative masterplan which demonstrates how this can be achieved is included in the accompanying Design and Access Statement.

Housing

- 4.2 The proposed development aims to deliver up to 100 high quality homes, offering a mix of sizes and tenures. The proposed housing mix will be in line with the recommendations from the adopted Local Plan (Gravesham Local Plan Core Strategy 2014) and latest Strategic Housing Needs Assessment (SHMA), unless local circumstances at the time of a reserved matters application justify a different mix.
- 4.3 In accordance with the National Planning Policy Framework 'Golden Rules' for development on Grey Belt land, the proposal includes the provision of 50% affordable housing, equating to up to 50 affordable dwellings. The precise tenure mix will be secured through the Section 106 Agreement, but is intended to be policy compliant.

Parameter Plan

- 4.4 A parameter plan (ref: 1509-004 Rev D) is submitted with the application for determination, which is supported by an illustrative masterplan (provided for information only). These, together with the DAS provide information relating to the proposed land uses, green and blue infrastructure, maximum height of buildings, access and movement across the development. The plans and documents also illustrate the proposed location of areas of publicly accessible open space.

Illustrative Masterplan

- 4.5 An illustrative masterplan (ref: 1509-006 Rev V3) is submitted with the application for information only. Importantly, layout is not for consideration as part of the outline application, therefore an illustrative layout has been prepared to show that the site has capacity to accommodate the proposed quantum of development and the associated detailed design requirements.

Access and Parking

- 4.6 Vehicular access to the proposed development is via the western access point onto The Drove Way. This access has been designed to safely accommodate both pedestrian and cycle access, and vehicular access for private cars and refuse vehicles. An additional eastern access point is proposed from The Drove Way for pedestrian/cycle and emergency vehicles only.
- 4.7 The proposed development access arrangements are shown on plan ref: 25-305-T-002-A.
- 4.8 The internal layout will establish a clear street hierarchy, comprising a tree-lined primary street from The Drove Way and a network of shared surface secondary streets, to be determined at reserved matters stage.

- 4.9 As confirmed within the submitted Transport Assessment (4.4-4.5.2), car parking and cycle parking will be provided in accordance with the Kent Design Guide Supplementary Guidance – Parking Standards (January 2025) requirements.
- 4.10 Full details of car and cycle parking, and the internal layout, will be secured by a suitably worded planning condition, to be approved at reserved matters stage.

Landscape

- 4.11 The design of the scheme has been shaped by a landscape-led approach. This has been achieved by retaining and reinforcing existing boundary hedgerows and mature trees where practicable.
- 4.12 The proposed development will deliver extensive areas of public open space, play space and natural and semi-natural spaces for leisure and recreation opportunities for both new and existing residents.
- 4.13 The public open space is intended to integrate with Sustainable Drainage Systems and deliver multi-functional space that meets drainage requirements and provides amenity value and biodiversity benefits.
- 4.14 As set out in further detail at section page 56-59 of the DAS, the scheme includes a range of publicly accessible open spaces, comprising a landscaped western gateway, a northern green corridor for informal recreation and natural play, a north-east orchard space, and a south-east woodland edge incorporating enhanced existing woodland.
- 4.15 Together, these areas provide informal recreation, natural play, biodiversity enhancements, integrated SuDS features, and pedestrian connections to the existing public rights of way network and surrounding community.

Design

- 4.16 The design of the scheme has been shaped by a detailed understanding of the site's opportunities and constraints.
- 4.17 Although this is an outline application, the development will be guided by the design principles set out in the DAS and parameter plan, which establish a framework for high-quality, context responsive design at reserved matters stage.
- 4.18 The architectural style of buildings will reflect local character identified in the local context section of the DAS and use a cohesive palette of high-quality materials to create an attractive addition to Istead Rise.
- 4.19 Distinctive and enhanced materials, details and boundary treatments can be delivered at key buildings and frontages to aid legibility. A durable palette of high-quality materials and details is to be implemented to reflect a contemporary design approach, and a variety of boundary treatments will be utilised within the development to define private spaces from the public realm.
- 4.20 Dwellings will front onto public open space and key streets to provide passive surveillance and a strong relationship with the public realm, while respecting the amenity of adjoining properties, including appropriate separation distances.

Drainage and Infrastructure

- 4.21 The drainage strategy for the site includes Sustainable Urban Drainage Systems (SuDS) in the form of infiltration basins and permeable paving, which will provide source control, water quality, quantity, amenity and biodiversity benefits.
- 4.22 At the reserved matters stage, the potential to incorporate swales, rain gardens, filter drains and rainwater harvesting butts will be reviewed and these will be included where possible.

Technical Considerations

- 4.23 The technical elements in relation to the proposal have all been considered, with the necessary supporting documents and plans submitted with this application. The findings of these reports are summarised within section 6 of this Statement.

5. Decision Making Framework

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 requires local planning authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF, and its presumption in favour of sustainable development, including its approach to meeting housing need and associated approach to residential development in the Green Belt, is one such material consideration.

The Development Plan

- 5.2 The statutory Development Plan comprises the following:

- Gravesham Local Plan Core Strategy (2014);
- Gravesham Local Plan First Review (1994) Saved Policies; and
- Kent Minerals and Waste Local Plan 2024-30.

- 5.3 The following adopted Core Strategy policies are most important and/or relevant to the determination of the application:

Gravesham Local Plan Core Strategy (2014)

- Policy CS01: Sustainable Development
- Policy CS02: Scale and Distribution of Development
- Policy CS11: Transport
- Policy CS12: Green Infrastructure
- Policy CS13: Green Space, Sport and Recreation
- Policy CS14: Housing Type and Size
- Policy CS15: Housing Density
- Policy CS16: Affordable Housing
- Policy CS18: Climate Change
- Policy CS19: Development and Design Principles

Gravesham Local Plan First Review (1994) Saved Policies

- Policy LT5: Additional Open Space and Playing Fields
- Policy T1: Impact of Development on Highway Network
- Policy T4: Development outside the Built-Up Area
- Policy T5: New Accesses onto Highway Network
- Policy T9: Housing Estate Layouts
- Policy P3: Vehicle Parking Standards

Other Material Considerations

Supplementary Planning Documents (SPDs)

- 5.4 GBC has published SPDs which provide further guidance as to the interpretation of local plan policies:

- SPG2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – National Described Space Standard (2015)
- SPG4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code SPD (2024)
- Gravesham Landscape Character Assessment (2009)

Emerging Local Plan

- 5.5 The Council is currently progressing a new Local Plan intended to provide the statutory planning framework for the borough until 2042.
- 5.6 The Proposed Submission Draft (Regulation 19) was published for a 6 week consultation period on 17 April 2026. Plan examination is estimated to take place in public hearings in spring 2027, with the plan being adopted in 18 months at the earliest.
- 5.7 At this stage of the process, limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan (as confirmed in a recent GBC planning committee report for 8 April 2026).
- 5.8 It is worth noting that the southern part of the application site was identified as a draft site allocation (GB62) within the Council's Site Allocations and Development Management Policies Document Regulation 18 Consultation in December 2020 (Stage 2). The site was identified as being a 'developable site' within the Strategic Land Availability Assessment (2020) which informed the draft allocation.
- 5.9 This draft allocation was also supported by the Stage 2 Green Belt Assessment (August 2020) which included this site (Ref IR4). There have been no updates to this evidence base which has been published by GBC.
- 5.10 It had been anticipated that the draft allocation would be carried through to the Regulation 19 version of the draft local plan. The Draft Regulation 19 document, published on 17 April 2026, does not include the site as a site allocation. No justification has been given concerning the reason why the previous draft allocation (GB62) on the site has not been carried forward, despite the Green Belt evidence base remaining unchanged.
- 5.11 Although the emerging Local Plan carries limited weight at this stage, the following draft policies are relevant to note:
 - Policy LP1: Spatial Development Strategy: Managing Change
 - Policy LP7: Rural Areas
 - Policy LP8: Green Infrastructure and Nature Recovery
 - Policy LP9: Climate Change
 - Policy LP10: Water Resources and Flood Risk
 - Policy LP11: Achieving High Quality Design, Sustainability & Place Making
 - Policy LP12: Housing Delivery, Mix and Affordability
 - Policy LP15: Conserving & Enhancing Gravesham's Historic Environment
 - Policy LP18: Supporting Sustainable Communities
 - Policy LP19: Sustainable Transport and Decarbonisation

- Policy LP20: Open Space, Sports and Leisure
- Policy LP21: Infrastructure and Developer Contributions

Weight to be given to Plan Policies

- 5.12 While the NPPF (2024 updated February 2025) does not change the statutory status of the Development Plan, the degree of consistency of the Core Strategy policies with the NPPF will affect the degree of weight to be accorded to them.
- 5.13 The NPPF last updated in 2024/25 and retains the presumption in favour of sustainable development, which is specifically focused on meeting development needs in a sustainable way. It is notable that the Core Strategy was adopted in 2014. Whilst the age of the plan is not necessarily a determining factor in considering whether the policies are consistent or inconsistent with the NPPF, it does strongly indicate that the Development Plan has not kept up with, and no longer reflects, current development needs, particularly those policies governing the amount and location of development. Such policies are likely to be out of date.
- 5.14 Indeed, NPPF footnote 8 confirms that for applications involving housing, the most important policies will be out of date (and can therefore be attributed reduced weight) in situations where the local planning authority cannot demonstrate a five-year housing land supply HLS.
- 5.15 The Five Year HLS Statement published in February 2025 demonstrates that GBC cannot currently demonstrate a five-year HLS, with only 3-year supply as of 1 April 2024. Furthermore, the submitted Housing Land Supply Review Report prepared by Icen Projects provides an updated assessment of the supply position and concludes that GBC can currently only demonstrate a 1.2-year supply as of 1 April 2026.
- 5.16 The HLS position represents a substantial and serious shortfall with no immediate remedy through the adoption of a new Local Plan and as such delivery of up to 100 homes would present a significant benefit.
- 5.17 In this scenario paragraph 11(d) of the NPPF is engaged, triggering the presumption in favour of sustainable development.
- 5.18 NPPF paragraph 11 d) ii confirms that, where policies most important for determining an application are out of date planning permission should be granted unless the site is either a protected area or asset of particular importance (as identified in NPPF footnote 7), or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (known as the tilted planning balance), having particular regard to directing development to sustainable locations. Whilst the site is designated Green Belt, it is not subject to 'footnote 7' protection (further explained below with respect to Grey Belt provisions).
- 5.19 In short, and in accordance with paragraph 11(d) and footnote 8 of the NPPF, the most important policies for the determination of this application for housing are out of date and the 'tilted balance' is engaged. In these circumstances, adopted Development Plan policies which seek to restrain development within sustainable settlement locations, and which do not reflect the revised spatial strategy and delivery-focused approach of the draft Framework, are likely to be inconsistent with current national policy and should therefore be attributed reduced weight in the determination of this application.

- 5.20 With respect to the emerging plan, owing to its early state of preparation, the Regulation 19 Local Plan attracts limited weight in decision making, in accordance with paragraph 49 of the NPPF.
- 5.21 It is also clear, given the plan-production timetable that the housing land supply shortfall will only be resolved in the short-medium term through the development management process (grant of planning applications) rather than the plan-led process.
- 5.22 The following sections undertake an appraisal of the application proposal within this framework.

NPPF Proposed Changes

- 5.23 An updated consultation draft of the NPPF was published in December 2025, setting out proposed amendments intended to increase housing delivery, stimulate regional economic growth and streamline the planning process.
- 5.24 Draft policy GB7 identifies forms of development that are not inappropriate in the Green Belt and, accordingly, should not be regarded as harmful to the Green Belt or required to demonstrate Very Special Circumstances. Part g) of that policy states:
 - i. 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;*
 - ii. there is an evidenced unmet need for the type of development proposed;*
 - iii. the development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and*
 - iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8*
- 5.25 The proposed definition of Grey Belt is also amended to remove reference to the 'strong reasons for refusal' currently set out within Footnote 7, which presently identifies policies relating to protected areas and assets that provide a clear reason for refusing development. Instead, 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)*".
- 5.26 Furthermore, draft policy GB8 states that "*where major development involving the provision of housing on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, complies with the Golden Rules, this should be given substantial weight in considering whether to grant planning permission*".
- 5.27 In summary, the draft policies indicate that substantial weight should be afforded to schemes addressing unmet housing need, particularly where local authorities are unable to demonstrate an adequate housing land supply and where development proposals satisfy the Golden Rules.

6. Principle of Development

- 6.1 One of the key Government priorities promoted through the NPPF is to boost the supply of homes. To this end the NPPF was subject to fundamental changes in December 2024, following the Written Ministerial Statement in July 2024 that recognised the acute housing crisis. To help resolve the acute housing need, the NPPF also changed the approach to Green Belt, specifically prioritising the development of previously developed land and 'Grey Belt', is essential to achieving this aim.
- 6.2 Clearly in this case, given the housing delivery and land supply context, there is a demonstrable need for the housing development as proposed in order to help address this crisis.
- 6.3 The below assessment addresses relevant policy at national and local levels, and assesses the proposal, including against the purposes of the Green Belt (drawing on the supporting Grey Belt Appraisal, prepared by tor&co), concluding that:
- The proposed development would utilise Grey Belt land and would not fundamentally undermine the purposes of the remaining Green Belt across the plan area
 - The development would be in a sustainable location
 - The development would meet the Golden Rules, which should be given significant weight in favour of granting planning permission
 - The development would not constitute 'inappropriate' development, such that the tilted planning balance remains engaged
 - Notwithstanding the above, the proposed development demonstrably comprises the 'Very Special Circumstances' necessary to permit inappropriate development within the Green Belt
 - In all circumstances the very substantial benefits of the development clearly outweigh the harm, even in circumstances where the Green Belt harm is given substantial weight.

Green Belt – Local and National Policy

- 6.4 The site falls wholly within the Gravesham Green Belt. Core Strategy Policy CS02 relates to the scale and distribution of development and states that development outside the defined settlement hierarchy and within the Green Belt will be supported where it is compatible with national policies for protecting the Green Belt and policies within the Development Plan.
- 6.5 Section 13 of the NPPF sets out national policy relating to the Green Belt, clarifying its function and the circumstances in which residential development can be permitted. Paragraph 143 provides that the Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and

- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.6 The NPPF goes on to set out assessment criteria for proposals within the Green Belt, confirming that harm to the Green Belt should be given substantial weight and that inappropriate development is by definition harmful, and should not be approved except in very special circumstances, stating:
- “Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*
- 6.7 Updated national policy supports housing development on land that meets the Grey Belt definition and satisfies the relevant criteria set out in the NPPF. In particular (with reference to NPPF paragraph 155):
- 1) *The development must utilise Grey Belt Land and its development must not fundamentally undermine the ability of the wider Green Belt to meet all five purposes*
 - 2) *There must be a demonstrable need for the development*
 - 3) *The development must be in a sustainable location*
 - 4) *The development must meet the Golden Rules*
- 6.8 If development is considered to be not inappropriate development on Grey Belt, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness (PPG 64-014-20250225).

Grey Belt Considerations

- 6.9 ‘Grey Belt’ is defined in the NPPF Glossary 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”*. The definition goes on to confirm that sites cannot be defined as Grey Belt if any of the designations under NPPF footnote 7 would provide a strong reason for refusing development. In the emerging NPPF draft, it is proposed that the reference to footnote 7 is removed from the Grey Belt definition.
- 6.10 For clarity, Grey Belt land does not need to be considered in terms of its contribution to purposes c) or e), and does not need to be considered in terms of its impact on openness (if developed).
- 6.11 Drawing on the submitted Grey Belt Assessment (prepared by tor&co) consideration is given below to the contribution of the site against purposes (a), (b), and (d). In undertaking the Assessment, regard has been had to the recently updated Planning Practice Guidance (PPG) on Green Belt, which outlines how contribution to Green Belt purposes can be assessed and highlights illustrative features to consider in identifying the following categories of contribution: ‘Strong’, ‘Moderate’ and ‘Weak or None’. In terms of the areas/parcels of Green Belt to be assessed, the PPG encourages sub-division into small areas particularly around existing settlements.

- 6.12 In undertaking the Green Belt Assessment, regard has also been had to the GBC Stage 2 Green Belt Assessment (GBA) (August 2020), which included the application site (Ref IR4) and concluded the following:

‘Releasing the parcel would not extend the settlement edge significantly northwards and the open field’s strong boundaries limit the extent to which its release and development would cause urbanising containment of adjacent Green Belt land. The hedgerows and woodland would form strong boundaries which mean release would not significantly affect the integrity of the remaining open land between Istead Rise and Gravesend’.

Purpose (a) – to check the unrestricted sprawl of large built up areas

- 6.13 With regard to Purpose (a), the PPG makes it clear that this purpose “relates to the sprawl of large built up areas. Villages should not be considered large built up areas.”
- 6.14 As identified within the Gravesham Settlement Hierarchy Background paper, October 2020 (Table 6, page 19) Istead Rise is a ‘large village’. As such, the site is not adjacent to a large built up area and plays no role in maintaining the unrestricted sprawl between towns.
- 6.15 As set out within the submitted Grey Belt Appraisal prepared by tor&co, development of the site would not represent an incongruous extension to the pre-existing settlement pattern which has an irregular edge along its northern boundary. Strong and defensible boundaries provide a clear limit to potential development.
- 6.16 Overall, the site is considered to make a weak/no contribution to purpose A.

Purpose (b) – to prevent neighbouring towns merging into one another

- 6.17 As confirmed above, the site is situated on the edge of the village of Istead Rise and is not adjacent to any other towns.
- 6.18 At the local level the site does not lie directly between Gravesend and Strood and therefore it does not play a role in preventing these neighbouring towns from merging into one another or maintaining the break in built development between them.
- 6.19 As confirmed by the submitted Grey Belt Appraisal, the site does not form part of the gap between towns or contribute to visual separation. The ZTV in the submitted Landscape and Visual Impact Assessment (LVIA) demonstrates there will be no intervisibility from the open land between Gravesend and Strood. Indeed, potential views will be confined to the local landscape.
- 6.20 It has been clearly established that development at this location would not materially alter the physical separation between towns. As such, the assessment concludes weak/no contribution to this purpose.

Purpose (d) – to preserve the setting and special character of historic towns

- 6.21 The PPG clarifies that Purpose (d) “relates to historic towns, not villages.”
- 6.22 Istead Rise is not a historic town, and as such the site makes no contribution to purpose D, which is supported by the Council’s own GBA.

Remaining Green Belt

- 6.23 In terms of the wider Green Belt, the requirement is that the development, “would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.”
- 6.24 The submitted Grey Belt Appraisal considers this at section 4.17 – 4.20 and concludes that development of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. As such, NPPF paragraph 155 criterion a) is satisfied.

Demonstrable Need for Housing Development

- 6.25 The need for residential development (as required by NPPF paragraph 155, criterion (b)) is significant and demonstrable. This is in the context of a significant and serious housing land supply shortfall in the Borough. GBC’s Five Year Housing Land Supply (5YHLS) Statement, published in February 2025, confirms that the Council can no longer demonstrate a five-year housing land supply. As of 1 April 2024, GBC can demonstrate only a 3-year supply, equating to a shortfall of 1,603 homes against the 4,032 requirement. More recent evidence indicates that this supply position has deteriorated further (see paragraph 6.28 below).
- 6.26 The district’s housing need increased following publication of the new standard method alongside the NPPF. The latest published Housing Delivery Test (2023) for Gravesham shows that, against a housing need of 1,789 dwellings, 1,056 dwellings were delivered across the Borough. This results in a Housing Delivery Test measurement of 59% for 2023. Consequently, a 20% buffer must be applied to Gravesham’s housing need figure, increasing the annual housing requirement from 672 homes per year to 806 homes per year.
- 6.27 This under-delivery has persisted, with Gravesham recording Housing Delivery Test measurements of 57% (2021), 53% (2022) and 59% (2023), all below the 75% threshold.
- 6.28 The Council’s latest housing land supply calculation is based on data that is now two years old and cannot be regarded as up to date. Accordingly, the Housing Land Supply Review Report prepared by Icen Projects and submitted alongside this application provides an updated assessment of the supply position using the most recent available evidence, with a base date of 1 April 2026. The Report concludes that GBC can currently demonstrate a deliverable housing land supply of 1.2 years.
- 6.29 The evidence set out within the Report represents a very substantial housing supply shortfall over the five year period of 2,691 homes.
- 6.30 In terms of affordable housing, the GBC Local Housing Needs Assessment (LHNA, 2025) identifies an annual net shortfall of 398 affordable dwellings over the next 10 years, based on the identified supply and projected need (paragraph 6.6, page 118). This indicates that current and planned delivery is insufficient to meet identified affordable housing requirements.
- 6.31 The Council’s completions data show that 3,273 net new dwellings were delivered across the Borough between 2012/13 and 2023/24 (an average of 273 per year). Over the same period, average annual affordable housing completions were 103 (38%) (LHNA 2025, p. 45). This ongoing under-delivery highlights a clear need for more affordable homes in the Borough.

- 6.32 Furthermore, the Proposed Submission Local Plan (Regulation 19) identifies that there were 972 households on the housing waiting list as of October 2025 (paragraph 2.22, page 22), highlighting significant unmet demand for affordable and rented housing within the Borough.

Sustainable Location

- 6.33 NPPF para 155 criterion c) requires that, *“the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.”*

- 6.34 The site is situated on the edge of Istead Rise and offers a prime location for development, being close to local services and facilities. The site is also well connected to Meopham station and Gravesend, with a range of active travel opportunities.

- 6.35 This locational sustainability has been acknowledged in the past and is recognised by the emerging Local Plan (Proposed Submission Document, April 2026), which states:

“Istead Rise is the Borough's second largest settlement with about 3,324 residents. Whilst it does not contain any significant employment uses, it has a local centre with a number of shops, including a small supermarket and post office. There is a range of local services and facilities, including a primary school, a GP surgery, a community centre (including a sports hall) and a local recreation ground and pitches”.

- 6.36 The submitted Transport Assessment confirms that the site benefits from a good level of accessibility by sustainable transport modes and is well connected to local services and facilities. Accordingly, the development would help to limit the need to travel, provide a genuine choice of transport modes, and deliver improvements that support these objectives, in accordance with paragraphs 110 and 115 of the NPPF.

- 6.37 This locational sustainability was evidently recognised by the Council in its decision to include the site as a draft allocation (GB62) within the Site Allocations and Development Management Policies Document Regulation 18 Consultation in December 2020 (Stage 2).

- 6.38 Although the site has not been included as an allocation within the Proposed Submission Draft (Regulation 19), the recently published SHLAA (April 2026) identifies the site as available and achievable for development. The assessment concludes that the site is suitable for development, subject to ecological and landscape mitigation measures and the resolution of identified utility constraints. Notably, the site's sustainability credentials and location are not identified as constraints to development.

- 6.39 As such, criterion (c) of paragraph 155 is satisfied.

The Golden Rules

- 6.40 To be 'not inappropriate' development in the Green Belt, the Golden Rules (NPPF para 156) must be met. The Rules are that the following contributions 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.

- 6.41 The adopted Development Plan requires 35% affordable housing provision under Policy CS16. Applying a 15% uplift, as required under NPPF paragraph 157, the affordable housing contribution required to satisfy the Golden Rules would be 50%.
- 6.42 As set out in Section 4 above, the proposed development includes 50% affordable housing, therefore satisfying part a) of the Golden Rules.
- 6.43 The proposed development will also contribute to local infrastructure by improving connectivity through new pedestrian footpaths linking to existing public rights of way, as well as enhancements to informal routes through the existing woodland area.
- 6.44 It is envisaged that a Section 106 agreement will secure financial contributions, where necessary, towards community infrastructure to mitigate any impact of the development.
- 6.45 Furthermore, as set out at page 56-59 of the submitted Design and Access Statement (DAS), the proposed development adopts a landscape-led approach. This includes the provision of naturalistic open space that responds appropriately to the site's rural edge location, creates new and enhanced habitats, and integrates, protects, and enhances the existing tree belts and hedgerows. The scheme also incorporates flood attenuation features, pedestrian paths, and natural play areas.
- 6.46 The proposals meet and exceed GBC's on-site public open space requirements, are in close proximity to existing community recreation and play facilities, and provide direct connections to the wider network of public rights of way.
- 6.47 Importantly, the scheme will open up areas of land that are currently inaccessible to the public and will create new recreational routes through and around the site, improving connectivity to play provision and the wider area.
- 6.48 As confirmed by the submitted Grey Belt Appraisal at paragraph 5.5, with the appropriate retention and enhancement of the existing landscape structure outlined above, a strong defensible boundary, mitigating any future potential encroachment into the remaining Green Belt, is achievable.
- 6.49 In summary, it is considered that the proposed development would comply with criterion c).

Weight to Green Belt Matters

- 6.50 The residential development of the site would utilise Grey Belt land, is in a sustainable location and the development meets the 'Golden Rules'. Therefore, the proposed development would be regarded as 'not inappropriate development'. As such, it would not be harmful to the Green Belt by definition.
- 6.51 The impact on openness does not need to be considered, and there is no significant negative/harmful weight attracted to the matter in the planning balance.

- 6.52 There is no conflict with the NPPF or Core Strategy Policy CS02, and harmful weight is not attracted to the application in this respect.
- 6.53 Conversely, NPPF para 158 confirms that:
- “A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”.*
- 6.54 The emerging updated NPPF (draft Policy GB8) goes further by proposing that major residential development on sites in the Green Belt which are the subject of a planning application and compliant with the Golden Rules should be afforded ‘*substantial weight*’ in favour of granting planning permission.

7. Technical Considerations

- 7.1 This section looks to the technical work submitted with the application, to consider site suitability for the development as proposed and its compliance with relevant development management policies. Collectively, the work and supporting documentation submitted with the application confirms that there is compliance with such policies and that there are no technical obstacles to the development.

Housing

- 7.2 Local Plan Policy CS14 requires 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.
- 7.3 The proposed development will deliver up to 100 high quality homes, offering a mix of sizes and tenures. The proposed housing mix will be in line with the latest Strategic Housing Needs Assessment (SHMA), unless local circumstances at the time of a reserved matters application justify a different mix.
- 7.4 The proposals are therefore compliant with Policy CS12 and emerging Policy LP 12.

Affordable Housing Statement

- 7.5 Within rural areas, Policy CS16 requires affordable housing on new housing developments of 0.1ha or more, at 35% of units. Applying a 15% uplift, as required under NPPF paragraph 157, the affordable housing contribution required to satisfy the Golden Rules is 50%.
- 7.6 The proposed development will deliver 50% affordable housing, therefore satisfying the NPPF, Policy CS16 and emerging Policy LP12.
- 7.7 The proposed affordable housing tenure split is of 70% affordable rented and social rented accommodation and 30% intermediate housing in compliance with Policy CS16. Unless the identified need changes.
- 7.8 The mix will be informed by the latest available Strategic Housing Market Assessment (SHMA) and any subsequent housing needs evidence, together with engagement with the Council's Housing Team and Registered Providers. This approach will provide the Council with the opportunity to secure a scheme that reflects current needs, maximises delivery of priority affordable tenures, and ensures that the development remains viable and deliverable in prevailing market conditions.
- 7.9 Retaining flexibility in this way is beneficial to the Council as it enables the affordable housing provision to be tailored closer to the point of delivery, ensuring that the scheme contributes optimally to meeting acute and changing housing needs.
- 7.10 In line with emerging Policy LP12, all houses will be built to M4(2) 'accessible and adaptable' standard of the Building Regulations, or equivalent. Furthermore, a minimum of 5% (or the target identified in the latest LHNA) of the new homes will be built to M4(3) 'wheelchair user' standard.
- 7.11 The precise tenure mix will be considered in consultation with the Council's Housing Team, during determination of the application and in the context of up to date evidence of need. Ultimately the affordable provision will be secured through the Section 106 agreement.

Transport and Accessibility

- 7.12 Local Plan Policy CS11 states that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.
- 7.13 Policy CS10 requires new development to be accessible by a range of transport modes and to contribute to improvements in public transport, walking, and cycling infrastructure. Policy CS12 requires all new development to be designed to reduce the need to travel and to maximise opportunities for travel by sustainable modes.
- 1.6 The NPPF places a clear focus on the need for new development to be sustainably located with reference to sustainable transport modes. In terms of assessing applications, NPPF paragraph 116 is clear that development should only be refused on highway grounds if *“there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 7.1 A Transport Assessment (TA) has been prepared by Velocity Transport Planning. Section 3 of the submitted TA confirms that the site is in an area which provides a variety of daily amenities, such as a primary school, shops, GP and community facilities, within acceptable walking and cycling distances.
- 7.2 There is a bus stop approximately 450m from the Site, where the 308 service provides seven journeys per day to Gravesend and Sevenoaks. Meopham Station (3.1km from the site) offers two trains per hour to London Victoria (33 minutes), seven days a week, accessible by bus in approximately 15 minutes or by cycle in approximately 11 minutes.
- 7.3 The A2 Strategic Road Network is accessible within approximately 4 minutes by car via Wrotham Road.
- 7.4 It is therefore demonstrated that future residents and visitors will be able to travel to and from the site by sustainable modes of transport modes in favour of the private car. The application is also supported by an Outline Travel Plan, which aims to increase active travel levels.
- 7.5 The TA includes a trip generation assessment which shows that the proposed development is targeted to generate no more than 49 and 47 two-way vehicle movements during the AM and PM peak hours, respectively. This is based on a targeted 10% reduction in peak hour vehicle trips as part of a vision-led, Decide and Provide approach, consistent with Kent County Council (KCC) and NPPF guidance. This target is considered achievable given the level of sustainable transport accessibility from the site, and the package of measures included within the submitted Travel Plan.
- 7.6 Key junctions have also been assessed to evaluate impacts on local road network capacity. The TA demonstrates that both key junctions remain within capacity in the 2031 assessment year, with additional committed developments that may come forward.

- 7.7 As such, it is considered that the traffic impact of the proposed development can be suitably accommodated on the local highway network with no severe highway impacts.
- 7.8 The development proposals also include enhancing walking and cycling connections to the surrounding area and connections to the existing public right of way adjacent to the site.
- 7.9 In summary, the proposed development would prioritise sustainable transport modes, giving priority to pedestrian and cycle movements and facilitating access to high quality public transport, in line with the objectives of the NPPF, Local Plan Policy CS10, CS11 and CS12 and emerging Local Plan Policy LP18 and LP19.

Design, Capacity and Layout

- 7.10 Local Plan Policy CS19 sets design criteria to ensure new development conserves and enhances local character, integrates with its surroundings, uses sustainable construction, is adaptable to changing lifestyles, and is resilient to climate change.
- 7.11 Policy CS15 requires new housing to be developed at a density that is consistent with achieving good design and which does not compromise the distinctive character of the area in which it is situated. Within the rural area, new residential development is expected to achieve a minimum density of 30 dwellings per hectare.
- 7.12 While this application is in outline, with all matters reserved except for access, the DAS clearly demonstrates the effective use of the land and how a sustainable, landscape-led, urban extension could be achieved within the submitted parameters, reflecting local character and adding positively to the area.
- 7.13 In developing the principle demonstrated in the Parameter Plan and through the DAS, a thorough review of local design guidance and character has been undertaken to ensure this logical extension to Istead Rise positively responds to defining local characteristics.
- 7.14 The density of the proposed development will reflect the established, low-rise, domestic and suburban character of Istead Rise. A mix of locally familiar house types can deliver an efficient density of approximately 37.5 dwellings per hectare (dph).
- 7.15 A landscape-led approach has been taken within the proposal, with the creation of new and attractive green spaces, creating new spaces and connections for the new and existing community to enjoy. As such the proposed development will comply with adopted and emerging Local Plan design, appearance and amenity policies and the NPPF.

Green Infrastructure and Open Space

- 7.16 GBC's Open Space Standards Paper (OSSP) sets out the requirements for types of open space provision for new developments. The landscape strategy section of the DAS confirms the requirements based on an anticipated population of 230 for 100 new homes.
- 7.17 The landscape strategy includes the following elements:

- an attractive landscape setting for the development that retains, integrates and enhances the existing enclosure and rural field pattern maintaining a strong rural character interfacing with the surrounding landscape;
- provides a sensitively designed and robust new rural new edge to Istead Rise;
- provides the required open space and play provision;
- integrates the new and existing communities with shared landscape open space;
- provides a multifunctional open space area;
- connects with the neighbourhood community facilities and public rights of way network;
- biodiversity and landscape strategies integrated to create new habitats and enhance existing and
- drainage attenuation strategy integrated into landscape and biodiversity strategy.

7.18 In summary, the proposals meet and exceed GBC's public on-site open space requirements, are in close proximity to the community recreation and play facilities and connect directly to the wider network of public rights of way.

Landscape and Visual Impact

- 7.19 Policy CS12 seeks to ensure that the overall landscape character and valued landscapes will be conserved, restored and enhanced and requires proposals to take account of the Gravesham Landscape Character Assessment, where relevant.
- 7.20 A Landscape and Visual Impact Assessment (LVIA), prepared by tor&co, accompanies the application. The LVIA assesses potential effects of the proposed development on the landscape and visual receptors that have been identified, taking into account the primary mitigation measures, including the planting proposals designed to fit into and complement the local landscape and enhance the habitat structure and biodiversity.
- 7.21 In terms of existing baseline, the site is visually well-contained by strongly vegetated boundaries to the north, east and west. To the immediate south of the site, development on The Drove Way and, to a lesser extent, Fairview Road south west of the site effectively form a visual barrier, screening the site from the remaining settlement area of Istead Rise.
- 7.22 The LVIA studies, fieldwork and site analysis conclude that subject to a sensitive design approach that respects, protects and enhances the boundary vegetation, significant landscape effects would be restricted to the site itself. Effects on the wider landscape would be small or negligible. Likewise, significant visual effects would be very localised, impacting on views from The Drove Way and from the section of public bridleway NU27 east and north east of the site.
- 7.23 This conclusion aligns with GBC's SHLAA and Landscape Sensitivity and Capacity Study, confirming that from a landscape and visual aspect, the site is suitable for development as two-storey residential development.
- 7.24 In summary, the landscape strategy seeks to conserve, restore and enhance the local landscape in line with Policy CS12.

Heritage and Archaeology

- 7.25 Policy CS20 states that proposals will be supported which preserve the significance of the Borough's heritage assets. 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. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.26 A Historic Environment Desk Based Assessment has been prepared by GHC Archaeology and Heritage Ltd.
- 7.27 The assessment establishes that no designated or non-designated heritage assets will be impacted by the proposed development.
- 7.28 In terms of archaeology, the Assessment concludes that there is the moderate potential for prehistoric to Roman period remains, and low potential for remains of all other dates to survive below-ground within the study site.
- 7.29 The proposed development works have the potential to impact any archaeological deposits which may survive within the study site. However, preservation levels of any archaeological remains that may have been present are expected to be very low following the site's previous uses for chalk working and, most importantly, as a plantation where the planting and subsequent grubbing out of trees across the study site and subsequent return to pasture would have had significant below ground impacts.
- 7.30 As such, the proposed development is compliant with the requirements of Policy CS20 and the NPPF in assessing the significance of any heritage assets that may be affected by the proposed development.

Sustainability and Energy

- 7.31 Policy CS18 requires major development to include proposals for low carbon and renewable energy generation and CS19 sets out energy efficiency and resilience design principles.
- 7.32 The submitted Sustainability and Energy Statement, prepared by Turley, explains the measures incorporated at this stage and to be considered as part of the detailed design of the development to ensure the delivery of a sustainable development and addressing the requirements of local and national policies.
- 7.33 These measures include:
- A design which will consider the embodied carbon associated with construction materials, and select sustainable products where possible to reduce environmental impacts of construction;
 - Homes designed to be all-electric, through a range of enhanced fabric specifications, and utilising solar PV for renewable energy generation and ASHP for heating and hot water. This will allow residents to live net zero through the purchase of certified renewable electricity.
 - Specification of water efficient fittings to reduce water consumption aiming to achieve a target of 105 litres per person per day;

- Reduced emissions associated with private car travel though development in a sustainable location with access to public transport and amenities and installation of EV charging points;
- The development is located in flood zone 1 and will include a range of SuDS measures to manage surface water designed to accommodate a 1 in 100 year event including a 45% allowance for climate change; and
- Homes designed to take into account increasing annual temperatures set out in the UKCP18 climate projections to minimise the risk of overheating.

Ecology and Biodiversity

- 7.34 Policy CS12 states that there will be no net loss of biodiversity in the Borough and opportunities to enhance, restore, re-create and maintain habitats will be sought.
- 7.35 NPPF paragraph 187(d) requires planning decisions to minimise impacts on and provide net gains for biodiversity, including by “establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”.
- 7.36 An Ecological Impact Assessment (EclA) is submitted with the application, along with reports for badgers, bats and breeding birds.
- 7.37 The reports confirm that mitigation required through the scheme includes retention of woodland and scrub habitats, the implementation of a lighting strategy at reserved matters stage to avoid light spill onto adjacent woodland, the establishment of Root Protection Areas (RPAs) to protect retained trees, and the use of a Construction Environmental Management Plan (CEMP) and Precautionary Working Method Statement (PWMS).
- 7.38 Retained habitats include mixed scrub, with lowland mixed deciduous woodland enhanced through measures such as the selective removal of dead trees, the creation of additional open space within the woodland, and the potential veteranisation of retained trees. The proposed Root Protection Areas (RPAs) will provide a suitable buffer to the surrounding woodland habitat and protect retained tree roots from damage during construction activities.
- 7.39 Habitat creation includes lowland mixed deciduous woodland, modified grassland (amenity grassland), other neutral grassland (wildflower meadow), traditional orchard, sustainable drainage systems, and 30no individual trees. Collectively, these measures will contribute towards habitat enhancement and improved ecological connectivity across the site.
- 7.40 A Biodiversity Net Gain Assessment has been submitted which demonstrates that a net gain of at least 10% within the site boundary within the parameters of the outline application.
- 7.41 The preliminary assessment indicates a potential uplift of approximately 20.52% in habitat units, although this remains subject to refinement at the detailed design stage.
- 7.42 In summary, the proposed development will provide an on-site net gain in biodiversity, and the outline proposals demonstrate how habitats will be enhanced, restored and created in line with Policy CS12 and the NPPF.

Trees

- 7.43 An Arboricultural Impact Assessment (AIA), prepared by Sharon Hosegood Associates, has been prepared.
- 7.44 The AIA confirms that there are no Tree Preservation Order protected trees on the site, and the site is not within a Conservation Area. The existing woodland is not Ancient Semi Natural woodland and there is a designated Traditional Orchard requiring appropriate management.
- 7.45 The proposals retain the important enclosed woodland belts around the edges and provides enhancements for the existing woodland and orchard.
- 7.46 Existing trees have been retained wherever possible. The only removals required are 7 small trees to form the two access points from The Drove Way. The loss of these trees will have only have a highly localised visual impact.
- 7.47 Care will be taken of adjacent offsite trees during installation, following detailed design to avoid conflicts. The AIA provides details of how trees to be retained will be protected during construction by tree protection measures and the application of Arboricultural Method Statements.
- 7.48 The proposed development retains nearly all existing trees and provides opportunities to manage the woodland and orchard for ecological and landscape benefits. There will be new tree planting, habitat creation and new green space. Accordingly, the requirements of Policy CS12, CS13, CS19, the NPPF and emerging Policy DM24 are all met.

Noise and Air Quality

- 7.49 Policy CS19 requires new development to be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise and air pollution.
- 7.50 The submitted Noise Assessment concludes that subject to the implementation of he recommended acoustic design measures, the development is not considered to give rise to a significant adverse impact on health and quality of life in relation to noise, in accordance with paragraphs 187 and 198 of the NPPF.
- 7.51 Furthermore, in relation to paragraph 200 of the NPPF (agent of change), the mitigation measures proposed will ensure that the new development can be integrated effectively with existing businesses and land uses without imposing unreasonable restrictions upon them.
- 7.52 The submitted Air Quality Assessment (AQA) confirms that the construction phase of the development will not generate sufficient traffic to have a significant effect on roadside air quality. Furthermore, emissions from vehicles and machinery operating within the site will not give rise to significant effects. Dust mitigation measures will be included within a Construction Management Plan to be approved by the LPA prior to any construction commencing.
- 7.53 The AQA also confirms that air quality conditions for future residents of the proposed development will be acceptable, with concentrations well below the air quality objectives throughout the site.

- 7.54 There will be no on-site combustion plant and therefore no significant sources of emissions within the development itself. Furthermore, operation of the proposed development will not generate sufficient traffic to have a significant effect on roadside air quality

Flood Risk and Drainage

- 7.55 Local Plan Policy CS18 sets out the flood risk and sustainable drainage requirements for new developments in Gravesham.
- 7.56 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Logika.
- 7.57 The FRA confirms that the site is located within Flood Zone 1 which indicates a low risk of flooding from fluvial and tidal sources. The majority of the site is also located within a very low risk of flooding from surface water in the present day and future climate change scenarios for 2040 to 2060.
- 7.58 Surface water runoff generated in the proposed scenario would be attenuated and discharged to ground via infiltration through the use of infiltration basins.
- 7.59 The submitted outline drainage strategy shows that these features have been sized to accommodate runoff from all storm events up to and including the 1 in 100 year plus 45% climate change storm event. In line with KCC requirements, the basins have also been sized to accommodate runoff from a 1 in 100 year storm event followed by a 1 in 10 year storm event to account for half drain times of less than 24 hours during selected events not being achieved.
- 7.60 SuDS in the form of infiltration basins and permeable paving will be incorporated to provide source control, water quality, quantity, amenity and biodiversity benefits.
- 7.61 The outline foul drainage strategy demonstrates that foul flows would be managed at the site by utilising a series of two foul pumping stations to enable connection to the existing Southern Water foul network to the south.
- 7.62 In summary, it is considered that the proposed development is in line with the principles of the NPPF and local Policy CS18, and is therefore appropriate in terms of flood risk and drainage.

Contamination

- 7.63 Local Plan Policy CS19 states that new development should be located, designed and constructed to avoid adverse environmental impacts from land contamination.
- 7.64 The submitted Phase 1 Contaminated Land Assessment, prepared by Nott Group, identifies potential on-site sources of contamination, including historic agricultural activities, possible localised made ground associated with former building construction and demolition, and former orchard use.
- 7.65 A number of potential off-site contamination sources have also been identified within 500m of the site, including former orchards, infilled chalk pits, historical quarrying activities, waste exemption sites, electrical infrastructure, former nurseries, areas of made ground, a historical tank, a former landfill site, and surrounding agricultural activities.

- 7.66 Based on the preliminary conceptual site model, the overall risk of contamination affecting the development is considered to be low to medium. Accordingly, further site investigation, including chemical testing of soils and ground gas monitoring, is recommended to verify the risk assessment.
- 7.67 It is considered that any further site investigation, together with any necessary remediation works, can be secured by planning condition to ensure that the development is suitably protected from any potential impacts associated with land contamination.

Education and Health Care

- 7.68 Local Plan Policy CS10 states that where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations.
- 7.69 It is envisaged that any increased demand for education and healthcare provision arising from the proposed development will, where necessary, be addressed through financial contributions secured by a Section 106 agreement, in line with the Infrastructure Delivery Plan and Kent County Council's (2023) *Developer Contributions Guide*.

Draft Heads of Terms

- 7.70 Local Plan Policy CS10 states that, where necessary, developers will be required to provide or contribute towards new or improved physical or social infrastructure subject to viability considerations.
- 7.71 Such contributions will need to meet the CIL tests: necessary; directly related; and reasonably related in scale and kind. The Section 106 Agreement, be finalised during the application determination process, is expected to cover:
- Affordable housing
 - Education
 - Highways improvements
 - Contribution towards enhancing community facilities
 - Targeted recruitment and training in construction

8. Planning Balance

- 8.1 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date Development Plan without delay. Where the most important policies are out-of-date, planning permission should be granted unless:

“i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or

ii. 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, having particular 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”.

- 8.2 As set out in Section 6 of this Statement and the submitted Grey Belt Appraisal, the site is considered to be Grey Belt and the proposed development is therefore ‘not inappropriate’ in Green Belt terms. In addition, it is not considered that any Footnote 7 protected assets or constraints would provide a clear reason for refusal. The “tilted balance” is therefore engaged.
- 8.3 The most relevant Development Plan policies are out of date insofar as they are not fully consistent with the NPPF’s approach to meeting housing need. As such, limited weight should be afforded to any conflict with policies relating to housing supply and distribution. In any event, as the proposal is not inappropriate development in the Green Belt, there is no conflict with Policy CS02 (Scale and Distribution of Development).
- 8.4 As set out within Section 7, any identified harm in relation to landscape visual impact, the surrounding highway network and trees is considered to be very limited and can be appropriately mitigated.
- 8.5 In the event that the Council doesn’t agree with the Grey Belt case, decision making would revert to NPPF Paragraph 153 which states that inappropriate development is “by definition, harmful to the Green Belt”. In that scenario, substantial weight would be given to harm to the Green Belt by definition.
- 8.6 The substantial benefits of the proposed development set out below are considered to significantly and demonstrably outweigh any identified harm.

Benefits

- 8.7 In terms of the benefits, collectively and in some cases individually, these are very substantial as follows.

1. Provision of up to 100 to help address acute need and lack of supply.

- 8.8 There is no dispute that GBC cannot demonstrate a five-year housing land supply. The Council’s published Five-Year Housing Land Supply Statement confirms that the standard method housing requirement is currently 806 dwellings per annum and identifies a deliverable supply of 2,429 homes for the period 1 April 2024 to 31 March 2029. This equates to only a three-year housing land supply, with a shortfall of 1,603

homes against the five-year requirement of 4,032. On that basis alone, the presumption in favour of sustainable development is engaged.

- 8.9 However, the Council's latest calculation is based on data that is now two years old and cannot be regarded as up to date. The Housing Land Supply Review Report prepared by Iceni Projects and submitted alongside this application therefore provides an updated assessment of the supply position using the most recent available evidence, with a base date of 1 April 2026. That Report concludes that GBC can currently demonstrate a deliverable housing land supply of only 1.2 years, indicating that the supply position has deteriorated materially since the Council's published statement.
- 8.10 The Iceni evidence identifies a very substantial five-year housing supply shortfall of 2,691 homes.
- 8.11 Given the delays in the preparation of the Local Plan (as set out above at section 5), there is little prospect of an improvement to housing supply in the short-medium term.
- 8.12 Given the scale of the housing need and present inability for this need to be met by any means other than the granting of planning permission on unallocated land, the provision of housing and affordable housing must attract **substantial weight**.

2. Provision of 50% affordable housing to help address acute need and lack of supply

- 8.13 The GBC Housing Development Strategy (2024–2028/29)³ (HDS) seeks to deliver around 1,000 additional affordable homes, either delivered or started on site, within the next five years.
- 8.14 Against this, overall housing delivery has typically been around 273 homes per annum, with affordable housing comprising 38% (LHNA 2025, p. 45), largely due to viability challenges associated with lower values in the town centre.
- 8.15 The GBC Local Housing Needs Assessment (LHNA, 2025) identifies an annual net shortfall of 398 affordable dwellings over the next 10 years, based on the identified supply and projected need (paragraph 6.6, page 118). This indicates that current and planned delivery is insufficient to meet identified affordable housing requirements.
- 8.16 In this context, the 1,000-home target is significant. The Borough also has some of the highest housing needs in Kent, 972 households on the waiting list as of October 2025.
- 8.17 This ongoing under-delivery highlights a clear need for more affordable homes in the Borough.
- 8.18 The proposed development would accord with the 'Golden Rules' by delivering 50% affordable housing. The site could be delivered within five years and would therefore help to address the persistent shortfall of affordable homes in the short term. In these circumstances, and given Local Plan delays, the provision of up to 50 affordable homes is a **substantial benefit**.

³ <https://www.gravesham.gov.uk/downloads/file/785/housing-development-strategy>

3. Grey Belt

- 8.19 The site utilises Grey Belt land. While brownfield land is the first preferred location for development under the NPPF, Grey Belt has a greater priority than other Green Belt locations (e.g. NPPF para 148, albeit that this relates to plan-making). Therefore, particularly in Local Authorities where there are large amounts of Green Belt land, utilisation of Grey Belt land reduces pressure on the remaining Green Belt. The use of Grey Belt is therefore a standalone positive consideration which attracts **moderate weight**.

4. Compliance with the 'Golden Rules'

- 8.20 In accordance with paragraph 158 of the NPPF, the proposed development would comply with the Golden Rules. In accordance with the NPPF, this attracts **significant weight** in favour of the grant of planning permission.

5. Sustainably located development

- 8.21 The site is situated on the edge of the settlement boundary and offers a prime location for development. As demonstrated through the Transport Assessment, DAS and this Planning Statement, the site is within walking distance of key services and facilities and presents a logical extension to the village.
- 8.22 The site is well connected by public transport. Bus route 308 runs between Sevenoaks and Gravesend town centre and provides a direct connection to Meopham railway station, which is approximately a 15-minute bus journey from the site. Meopham Station is also accessible by other modes (approximately 11 minutes by cycle or 4 minutes by car).
- 8.23 Meopham Station provides frequent services to London Victoria (approximately 33 minutes, with two trains per hour), offering a realistic commuting option for future residents. It also provides onward connections to Chatham, Rochester, Gillingham and beyond.
- 8.24 The site also offers a range of opportunities for walking and cycling, providing future residents with a genuine choice of active travel modes. A Travel Plan has been submitted with the application to encourage sustainable travel behaviours.
- 8.25 The submitted Transport Assessment reconfirms that, being an extension of Istead Rise and well-connected to local services, the site would limit the need to travel and does offer a genuine choice of transport modes, and would provide improvements to these aims, in line with paragraphs 110 and 115 of the NPPF.
- 8.26 This consideration attracts **moderate weight**.

6. Provision of enhanced pedestrian / cycle connections

- 8.27 The proposed access designs incorporate 2m footways on both sides of each new access road, providing direct, footway-level connection between the development and existing pedestrian network.
- 8.28 The proposal would improve accessibility and connectivity with the local area, to the benefit of the wider community. This consideration attracts **moderate weight**.

7. Provision of publicly accessible open space and play facilities

- 8.29 The proposed development includes 2.83 hectares of green infrastructure, comprising, amongst other elements, public open space and play on the way features. This represents a quantitative and qualitative enhancement over policy expectations.
- 8.30 The proposed development will also improve connectivity to the new and surrounding public open spaces through new pedestrian footpaths linking to existing public rights of way, as well as enhancements to informal routes through the existing woodland area.
- 8.31 Importantly, the scheme will open up areas of land that are currently inaccessible to the public and will create new recreational routes through and around the site, improving connectivity to play provision and the wider area. The scale, accessibility and multifunctional nature of the proposed open space are therefore considered to constitute a meaningful public benefit, to which **moderate weight** should be afforded.

8. Ecological benefits

- 8.32 The proposed development would provide significant environmental enhancements, including Biodiversity Net Gain of at least 10% within the site boundary within the parameters of the outline application.
- 8.33 The preliminary assessment indicates a potential uplift of approximately 20.52% in habitat units, although this remains subject to refinement at the detailed design stage.
- 8.34 This would attract **moderate weight**.

9. Economic benefits

- 8.35 As set out within the submitted Socio-economic Benefits Statement, the delivery of up to 100 new homes would generate a range of tangible economic benefits, including:
- The creation of between 169 and 196 Full Time Equivalent jobs per year during construction.
 - Economic benefits through construction, including a total of £17.12 million Gross Value Added (GVA) each year, equating to a total of £34.24 million GVA over the estimated two-year build-out period, although it should be noted that not all of this will be retained locally.
 - An ongoing increase in Council Tax receipts. Up to 100 homes has the potential to generate approximately £238,860 of Council Tax per year once completed, providing a source of revenue funding for GBC and Kent County Council in delivering services.
- 8.36 Additionally, the resultant direct and indirect spend in the local economy from the occupiers of the development and associated contribution to supply chains would be of economic benefit. Particularly given the current economic environment, this would attract **moderate weight**.

The Planning Balance

- 8.37 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that my decision must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.38 The findings of the above, and very substantial benefits to be derived by the development, clearly outweigh conflict with Development Plan policy and other harm.
- 8.39 Without prejudice to the above, it is submitted that there are 'Very Special Circumstances' to justify granting planning permission for the development proposed should it be deemed that the proposed development fails to benefit from the Green Belt provisions and is inappropriate development in the Green Belt.
- 8.40 The application submission clearly demonstrates that the harm to the Green Belt through inappropriateness (given substantial weight) and any other harms (limited and localised) are clearly outweighed by other considerations, specifically the (very substantial) weight given to both the provision of market homes and affordable homes.
- 8.41 In terms of the purposes of the Green Belt, the site is considered to make limited or no contribution to purposes a), b) and d), as set out above. In relation to purpose c), the GBC Green Belt Assessment (2020) identifies the site as making a 'relatively significant' contribution on the basis that it is open and largely uncontained. However, the assessment also acknowledges that the absence of a clear distinction between the parcel and the inset settlement limits the extent of that contribution.
- 8.42 Furthermore, the proposed landscape strategy demonstrates that, through the retention and enhancement of the existing landscape structure, a strong and defensible boundary can be established. This would clearly define the settlement edge and mitigate the potential for future encroachment into the remaining Green Belt.
- 8.43 Taking these factors into account, the site is considered to make a Moderate contribution to purpose c). The proposed development would therefore have no meaningful adverse effect on the function or integrity of the remaining Green Belt across the wider plan area in relation to this purpose.
- 8.44 In respect of purpose e) assisting in urban regeneration, the proposed development would have no effect on this purpose, given the large proportion of GBC that is designated as Green Belt and there is a limited amount of identified urban capacity, relative to the housing need.
- 8.45 Whilst the level of harm associated with other considerations, taken together, is limited, it is clear that the very substantial benefits arising from the development as proposed do outweigh the harm including the substantial harm that would result from inappropriate development in the Green Belt. Very Special Circumstances exist.

9. Conclusion

- 9.1 The proposed development would utilise Grey Belt and comprise residential development, of which 50% would be affordable at the Land North of The Drove Way, Istead Rise, Gravesham.
- 9.2 There is no doubt that GBC has a severe need for new homes, and a history of poor delivery. The proposed development would make a substantial contribution towards the district's market and affordable housing needs, in the form of a sustainable extension to the existing settlement of Istead Rise. At this moment in time, the proposal is a highly appropriate and sustainable opportunity to significantly boost the supply of both market and affordable homes for local people in the short term in the absence of a new Development Plan.
- 9.3 The residential development would be accompanied by a substantial offering of publicly accessible open space and play features, including biodiversity and ecological enhancements.
- 9.4 While the detailed design would be confirmed at Reserved Matters stage, it has been demonstrated, through the application documentation, that a sustainable, landscaped development of this scale could comfortably be accommodated on the site. The Parameter Plan has been tested through the Illustrative Masterplan layout and can be conditioned to provide a mechanism to control the general scale and land configuration of the development.
- 9.5 The outline proposals and their defined parameters provide the framework to bring forward a high-quality sustainable development at reserved matters stage, and have been shown to be acceptable in terms of all relevant technical considerations.
- 9.6 While the site is within the Green Belt, it is well related to and framed by the urban area. In the absence of technical barriers to development, the proposed development would:
- Utilise Grey Belt and not fundamentally undermine the purposes of the remaining Green Belt across the plan area
 - Be in a sustainable location
 - Meet the Golden Rules
 - Not constitute inappropriate development
 - In any event be justified by Very Special Circumstances
- 9.7 In all circumstances the very substantial benefits of the development outweigh the harm, even in circumstances where that harm is given substantial weight. Planning permission should therefore be granted.

Appendix A – Consultation Material

[Address]

13th May 2026

DEVELOPMENT PROPOSALS, LAND NORTH OF THE DROVE WAY, ISTEAD RISE

Dear Resident,

We are writing to inform you about our emerging plans to develop the above site for much needed new homes and provide you with the opportunity to comment before we formally submit a planning application to Gravesham Borough Council.

The site is a level, irregularly shaped parcel which lies directly to the north of residential development on The Drove Way in agricultural use which is contained by mature trees and hedgerows and a small area of woodland in the south west corner.

It was identified by the Council as a suitable site for housing development in Regulation 18 Version of the Local Plan and, whilst still currently in the Green Belt, performs weakly on relevant Green Belt tests.

Our proposals seek to transform this land for around 100 new homes, of which 50% will be affordable. A new vehicular access points will be created onto The Drove Way, with pedestrian and cycle access throughout. As well as proposed enhancements to the existing woodland area, the landscape strategy for the site includes improvements to the existing informal footpath routes through the south-east woodland. These routes could provide links to the adjacent community centre, recreation ground and the public right of way adjoining the site.

We are currently in the process of preparing an outline planning application for the site with all matters reserved except access. This means that we are looking to establish the general type of development on the site, with all further details (including appearance, landscaping scale and layout) to be submitted separately after outline planning permission is approved.

We are now seeking the views of the local community and would welcome you to contact us on one of the following ways to let us know your thoughts:

- By email: isteadrise@ptarmiganland.com
- In writing: using address above, referencing "Istead Rise" in the subject line

Alternatively, if you have any questions please get in touch and we would be happy to discuss them.

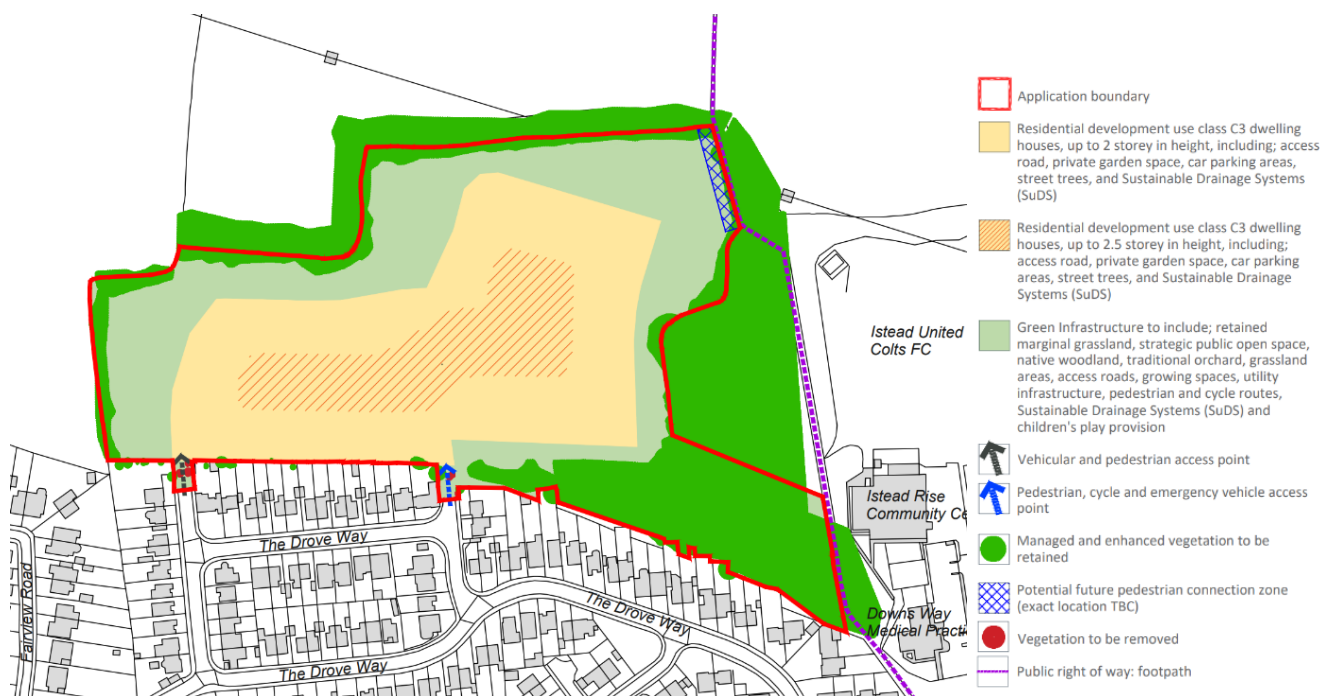
Yours faithfully,

Ptarmigan Ltd

Aerial Photograph of Site



Initial Plans for the Site



London
Birmingham
Bournemouth
Bristol

0203 664 6755
enquiries@torandco.com
torandco.com

All rights reserved.

No part of this document may be reproduced
in any form or stored in a retrieval system
without the prior written consent of the
copyright holder

©tor&co 2025

tor
&co

