

Land West of School Lane, Higham

Planning Statement

Incorporating Affordable Housing
Statement and Draft Heads of Terms

FINAL

DHA/35723

February 2026



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1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of M Scott Properties Ltd (hereafter 'the Applicant'), to accompany an Outline Planning Application for residential development at Land West of School Lane, Higham ('the Site').
- 1.1.2 The development relates to:
- "Outline planning application for the development of up to 50 residential dwellings (including affordable housing), vehicular access road from School Lane, internal roads, car parking, landscaping, public open space, and other associated works and infrastructure. All matters to be reserved with the exception of the main site access."*
- 1.1.3 This Application is accompanied by a suite of parameter plans which seek to establish the parameters for subsequent Reserved Matters Applications. These plans define the extent of built development, areas of landscaping and open space, and the access arrangements for the Site.
- 1.1.4 An 'Illustrative Site Plan' is provided and demonstrates how the Site could come forward in accordance with the parameter plans to deliver a high quality and locally distinctive development, which represents a logical extension to the existing settlement of Higham. This Plan is submitted for illustrative purposes only and does not form part of the planning application.
- 1.1.5 This Application is made in the context that Gravesham Borough Council (hereafter 'the Council', or 'GBC') cannot demonstrate a 5-Year Housing Land Supply (HLS) nor a sufficient Housing Delivery Test (HDT) result. As a result of this, the 'tilted balance' is engaged in accordance with National Planning Policy Framework (Paragraph 11d). The Development Plan is also out-of-date, with the Saved Policies from the Gravesham Local Plan dating back to 1994 and the Core Strategy being over 11 years old with no immediate prospects of a new Local Plan being adopted.
- 1.1.6 It is the conclusion of this Statement that the proposals will deliver a sustainable and high-quality development on a relatively unconstrained Site. The proposals will significantly contribute to addressing the dire need for market and affordable homes in the Borough and in doing so will deliver social, environmental, and economic benefits. The most important Policies in the Adopted Local Plan for determining the Application are out-of-date and in the case of any adverse impacts as a result of the development, these are considered to be significantly and demonstrably outweighed by the benefits. Planning Permission should therefore be approved without delay.

1.2 STATEMENT STRUCTURE

1.2.1 This Statement provides:

- an overview of the Site and its context;
- a summary of the relevant planning history;
- a description of the development, including details of the pre-application advice;
- details of the relevant planning policies; and
- an assessment of the proposals against the identifies planning policies and guidance and key material considerations.

1.3 APPLICATION DOCUMENTS AND PLANS

1.3.1 Alongside this Statement, a number of other technical reports have also been submitted which include those listed below. These should be read alongside this Statement, together with the following documents and plans:

Documents:

DOCUMENT	AUTHOR
Application Forms and Ownership Certificate	DHA Planning
Planning Statement (Incorporating Affordable Housing Statement, and Draft Heads of Terms)	
Design and Access Statement	
Transport Assessment	
Flood Risk and Drainage Strategy	M Scott Properties Ltd
Statement of Community Involvement	
Rapid Health Impact Assessment	
Topographical Survey	BB Surveys Ltd
Landscape and Visual Impact Assessment	Nicholsons
Green Belt Assessment	
Air Quality Assessment	AQE
Noise Assessment	Quantum
Preliminary Ecological Appraisal	Plumb Associates
Biodiversity Net Gain Assessment	
BNG Existing Habitat Plan	
Statutory Biodiversity Net Gain Metric	
Arboricultural Assessment	
Tree Protection Plan	
Tree Survey	

Energy & Sustainability Statement	BSE FM
External Lighting Assessment	
Archaeological Desk-Based Assessment	RPS
Heritage Impact Assessment	Smith Jenkins
Agricultural Land Classification Report	Terra Analytical UK
Phase 1 Desk Study	Jomas
Soakage Testing/ Ground Investigations	Ground and Environmental Services (GES) Limited
Bore Hole Logs and Test Results	

TABLE 1.1: SUBMITTED DOCUMENTS

Plans:

PLANS	REFERENCE	AUTHOR
Site Location Plan	DHA/35718/01	DHA Planning
Existing Site Plan	DHA/35718/02	
Outline Parameter Plan – Land Use	DHA/35718/03	
Outline Parameter Plan – Access	DHA/35718/04	
Outline Parameter Plan – Scale	DHA/35718/05	
Outline Parameter Plan – Landscape	DHA/35718/06	
Illustrative Proving Layout	DHA/35718/07	
Illustrative Masterplan	DHA/35718/08	

TABLE 1.2: SUBMITTED PLANS

2 SITE AND SURROUNDINGS

2.1 THE APPLICATION SITE

- 2.1.1 The Site is located entirely within the administrative boundaries of GBC.
- 2.1.2 The Site lies outside, but immediately adjacent to the development boundary for Higham and accordingly is considered to fall within the countryside in the context of the Council's adopted Proposals Map (September 2014) and falls entirely within the Green Belt.
- 2.1.3 The Site itself occupies approximately 2.8 hectares and comprises an agricultural field which is bisected by a Restricted Byway (Reference: NS153) which runs in an east-west configuration. Accordingly, the Site currently has pedestrian access via Taylors Lane to the west and School Lane to the east. However, the proposals will make use of a new vehicle access to School Lane located in the southeast corner of the Site.
- 2.1.4 Topographically, the Site generally falls from the western boundary towards the central area and continues to slope gently eastwards towards School Lane.
- 2.1.5 The Site is not subject of any specific landscape or environmental designations, being outside of any National Landscape or National Park; it is however within the Higham Arable Farmlands Character Area.
- 2.1.6 A review of Historic England's Listed Building Map Search confirms that two Grade II Listed Buildings are within 400 metres of the Site, which includes 'Firtrees' and 'Church of St John, Higham Upshire'. This, alongside archaeology, is considered further within the submitted Heritage Statement and Archaeological Desk Based Assessment respectively.
- 2.1.7 According to the Environment Agency's Flood Risk Maps, the Site lies wholly within Flood Zone 1 (for present day and 2070 – 2125) and is therefore at the lowest risk of fluvial flooding. With regard to surface water flooding, it is noted that there is an isolated parcel along the southern Site boundary (at the 1 in 100 and 1 in 1000), which would not constrain the development of the Site. Whilst matters of drainage and flood risk are not considered to constrain the development of the Site, by virtue of the Site being in excess of 1 hectare, the Application is accompanied by a Flood Risk and Drainage Assessment.
- 2.1.8 The Site lies immediately north of the settlement of Higham, with existing residential development adjoining its southern boundary. To the west, the Site is bounded by Taylors Lane, beyond which lies further residential development to the south-west and open countryside to the north-west. To the north, the Site is enclosed by a dense belt of vegetation, beyond which is Knowle Country House, a wedding venue. To the east, the Site is bordered by School Lane, with The Orchard Academy situated beyond.



FIGURE 2.1: APPROXIMATE SITE LOCATION PLAN (OUTLINED IN RED)

2.2 ACCESSIBILITY

- 2.2.1 As noted above, according to KCC's PRoW Map, there are a number of PRoWs within proximity of the Site, including the Restricted Byway (Reference: NS153) which bisects the Site in an east-west configuration. To the east this provides a connection to Public Footpath (Reference: NS184) which facilitates connections northward, eastward, and southward.
- 2.2.2 The site is located west of School Lane, with convenient road links via the A226 to Gravesend, Rochester, and the wider Medway area.
- 2.2.3 Higham is well served by public transport, with Higham Railway Station approximately 1km to the north, offering direct services to London and Strood, which is additionally accessible via footpath. Local bus routes (111, 311 and 417) provide regular connections to surrounding towns, with the nearest bus stop located within 250 metres of the Site.
- 2.2.4 Higham offers a range of day-to-day facilities and services, including Higham Primary School, shops, a post office, hair salons, public houses, restaurants, a village hall, medical facilities, and place of worship.

2.3 PREVIOUS PLANNING HISTORY

Planning Application Submissions

- 2.3.1 From a review of the GBC's Online Planning Register, the Site has not recently been the subject of any Planning Application.
- 2.3.2 Notwithstanding this, it is noted that an Outline Application for residential development of the Site was refused in April 1979 on the basis of conflicting with

Planning Policy restricting development outside the built-up area of Higham. Given the significant length of time since this decision and the subsequent changes to both National and Local Policy, it is noted that this previous application holds minimal relevance to any future Planning Application.

2.4 PLANNING CONTEXT

2.4.1 In summary:

- Higham is a defined larger village (Core Strategy 2014) offering a range of facilities and services.
- The site is within the Council's recently released draft Regulation 19 Local Plan – following on from its inclusion in the Regulation 18 Local Plan. We believe that this carries weight in the determination of the application.
- The Site is positioned in the countryside for the purposes of the Statutory Development Plan policies and is located within the Green Belt. However, it lies immediately adjacent to the defined development boundary.
- The Restricted Byway (Reference: NS153) crosses the Site in an east-west configuration.
- The Site is not subject to any landscape designations.
- There are no heritage assets on the Site.
- The Site lies within Flood Zone 1 (low probability), with an isolated area of surface water flood risk present along the southern boundary.

3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

- 3.1.1 The Application seeks Outline Planning Permission (with all matters reserved other than access) for up to 50 no. homes, including public open space, landscaping, and associated works.
- 3.1.2 The following Section should be read alongside the accompanying documents, plans, and Design and Access Statement (DAS). As set out in the DAS, the proposals follow a thorough review of the Site's opportunities and constraints which have shaped the proposals to create a high-quality and distinctive residential environment, informed by thorough Pre-Application engagement undertaken in May 2021 (PRE20210047) as well as further discussions with the Council's Policy team in early 2025.
- 3.1.3 This pre-application advice provided an overview of the site, and how the Council considered it appropriate to deliver housing within this sensitive location.
- 3.1.4 As noted above, this Application seeks approval of the accompanying suite of parameter plans, which fixes the general arrangement of development on the Site across different uses.
- 3.1.5 Whilst in Outline, the accompanying submission demonstrates that the Site can deliver a high-quality residential development which includes:
- Up to 50 no. dwellings, including 50% affordable housing;
 - A new vehicular access from School Lane, along with the retention and enhancement of public right of way connections, improving pedestrian permeability and opportunities for active travel;
 - Areas of public open space, including informal recreational space and landscape buffers that serve existing and future residents;
 - A sensitively arranged developable area ensuring appropriate separation to neighbouring properties, safeguarding existing residential amenity;
 - Residential development carefully located outside areas of Flood Risk; and
 - Provision of land set aside for buffer planting, biodiversity enhancement, and SUDS.
- 3.1.6 The DAS includes a series of framework plans and a masterplan, which illustrate how the proposals can be delivered, demonstrating:
- A layout that responds to Site topography and distinctive landscape features, with the development establishing strong frontages to the public realm whilst protecting residential amenity;

- Public open spaces positioned to create attractive entrances and contribute to a wider green network, offering meaningful places for recreation and social activity;
- Private external amenity space for all dwellings; and
- Adequate provision for allocated parking and visitor parking in accordance with adopted standards.

3.1.7 It is proposed that the dwellings will be no greater than two storeys in height although there is the potential for some of the dwellings to be single or one and a half storeys in the more sensitive locations. The two storey elements of the proposal are located where the Site's levels and outlook ensure they remain appropriate in wider views and do not appear overbearing, while helping to define key streets within the development.

3.1.8 A suggested palette of materials and details are included with reference to the character of the local area, further demonstrating how design quality can be achieved, integrating the development into the wider settlement.

3.1.9 Overall, it is demonstrated that the proposals can deliver a mix of market and affordable housing, alongside new areas of open space, landscaping, ecological enhancements, and improved pedestrian connections. These will be of benefit to new and existing residents and provide active travel opportunities

Affordable Housing

3.1.10 As noted above, whilst the details of the housing mix would be confirmed at Reserved Matters stage, it is envisaged that the proposals can deliver a mix of market and affordable housing. The proposals would provide for 50% affordable housing, exceeding the current local policy requirement and aligning with the NPPF's 'Golden Rules' for Green Belt development (within the Green Belt) and in accordance with the emerging Local Plan.

4 STATEMENT OF COMMUNITY INVOLVEMENT

4.1 OVERVIEW

- 4.1.1 One of the key purposes of the Planning Compulsory Purchase Act 2004 is to improve community involvement in the planning process. Further to this, the NPPF encourages Applicants to carry out pre-application discussions and participate in community engagement prior to the submission of Planning Applications.
- 4.1.2 In this case, early engagement has significant potential to improve the efficiency and effectiveness of the Planning System for all parties. NPPF Paragraph 40 sets out that good quality pre-application discussions enable better coordination between public and private resources and improved outcomes for the community.
- 4.1.3 The PPG sets out under 'Before Submitting an Application' the process and expectation for pre-application discussions and further encourages engagement with the community where it be of value to the Application process.
- 4.1.4 The Applicant has engaged with GBC Planning Officers, resulting in a scheme that has sought to take into account the views of all parties as far as possible prior to the submission of this Application.

Pre-Application Engagement

- 4.1.5 Formal Pre-Application engagement has been undertaken with GBC officers in relation to the development of the Site.
- 4.1.6 This took place in January 2021, where the scheme was presented to Officers and comments were provided about the form of the development and the layout within the site.
- 4.1.7 Following on from the receipt of this advice, the scheme was amended and the scheme now submit reflects the comments made by the Local Planning Authority.
- 4.1.8 Further engagement has been undertaken with KCC's Highways and Transportation department in September 2025 and KCC LLFA.

Community Consultation

- 4.1.9 M Scott Properties Ltd held a public consultation event from 2pm to 7pm on the 29th of January 2026 at Higham Memorial Hall.
- 4.1.10 In order to raise awareness of the event, leaflets were posted to over 1,500 residential and business addresses in Higham and Lower Higham on the 15th of January. The consultation website replicated the information presented at the event and the paper feedback form.
- 4.1.11 The feedback forms and website both requested that all feedback was provided by the 15th of February, and the website was live until the morning of the 16th of February.

- 4.1.12 A total of 33 feedback forms were received (9 hard copies and 24 online).
- 4.1.13 All comments and suggested improvements received via the feedback forms and at the event have been collated by subject matter and appropriately considered.
- 4.1.14 Further details are provided within the accompanying Statement of Community Involvement (SCI), prepared by M Scott Properties Ltd.

5 PLANNING POLICY FRAMEWORK

5.1 OVERVIEW

- 5.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 5.1.2 This Section sets out the relevant Policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in determining this Application.
- 5.1.3 Rather than rehearsing Policies, this Section highlights the relevant policies applicable to the application at hand. Policies are then explored in further detail within Section 6.
- 5.1.4 The Statutory Development Plan which is relevant to the application includes:
- Gravesham Local Plan Core Strategy (2014);
 - Gravesham Local Plan First Review (1994) Saved Policies; and
 - Kent Minerals and Waste Local Plan 2024-30.
- 5.1.5 In addition to the Development Plan, there are other material considerations including the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and other supplementary planning guidance and standards.
- 5.1.6 GBC is currently preparing a new Local plan, which is at Regulation 18 stage. This is also therefore a material consideration for all Applications.

5.2 STATUTORY DEVELOPMENT PLAN

GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 5.2.1 The following Policies within the Gravesham Local Plan Core Strategy are deemed relevant to the proposed development:
- **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

5.2.2 The following Saved Policies within the Gravesham Local Plan First Review are deemed relevant to the proposed development:

- **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

KENT COUNTY COUNCIL MINERALS AND WASTE LOCAL PLAN 2024-30

5.2.3 The following Saved Policies within the Kent County Council Minerals and Waste Local Plan are deemed relevant to the proposed development:

- **Policy CSW3:** Waste Reduction

5.3 MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF), Updated December 2024

5.3.1 The NPPF sets out the Government's planning policies for England and puts "*the presumption in favour of sustainable development*" at the heart of the planning system. Those sections of the NPPF which are relevant to the determination of this application include:

- **Section 2:** Achieving Sustainable Development;
- **Section 4:** Decision Making;
- **Section 5:** Delivering a Sufficient Supply of Homes;
- **Section 8:** Promoting Healthy and Safe Communities;
- **Section 9:** Promoting Sustainable Transport;
- **Section 11:** Making Effective Use of Land;
- **Section 12:** Achieving Well-Designed Places;
- **Section 14:** Meeting the Challenge of Climate Change, Flooding, and Coastal Change;
- **Section 15:** Conserving and Enhancing the Natural Environment; and
- **Section 16:** Conserving and Enhancing the Historic Environment.

Planning Practice Guidance

5.3.2 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated and reviewed.

5.3.3 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral

part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:

- Air Quality;
- Biodiversity Net Gain;
- Climate Change;
- Community Infrastructure Levy;
- Design: Process and Tools;
- Effective Use of Land;
- Healthy and Safe Communities;
- Historic Environment;
- Housing: Optional Technical Standards;
- Housing Supply and Delivery;
- Natural Environment;
- Noise;
- Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space; and
- Travel Plans, Transport Assessments and Statements.

Regulation 18 and 19 Emerging Local Plan

- 5.3.4 GBC has released a draft of the Regulation 19 Draft Local Plan, which was reported to the Cabinet on the 2nd of February 2026. This Local Plan includes this site as a draft allocation (under Policy LP7.1F) for approximately 60 dwellings. The policy sets out a number of criteria that need to be considered as part of the determination of any application:

In addition to meeting the policies in the plan, any developer will be required to provide:

Access, Highways and Sustainable Travel

- A primary vehicular and pedestrian access shall be provided onto School Lane. A secondary /emergency access shall be provided in a location be agreed.
- Walking and cycling route through the site that facilitates active travel routes to Higham Railway station, Higham Primary School and Higham Local centre.
- A layout that safeguards the alignment and character of the PRow that crosses the site (NS153 (Restricted Byway)).

Infrastructure

- Contributions towards increased primary education capacity at Higham Primary school and secondary provision within the wider Borough in line with the latest IDP.

Urban Design Principles

- A landscape led development which positively responds to the site topography, its edge of rural settlement location and prominence in the

wider rural landscape and in views from the west and north, and retains the rural character of Taylors Lane, taking account of the outputs of a Landscape and Visual Impact Assessment.

- A layout that safeguards the alignment and character of the PRoW that crosses the site (NS153 Restricted Byway).
- ensure the amenity of existing residents to the south of the site is safeguarded.

Green Infrastructure

- Green and blue Infrastructure, informed by a Landscape and Visual Impact Assessment, and Ecological Impact Assessment that:
 - includes strategic landscape measures which maximise the retention and enhancement of existing trees and hedgerows and creates a clearly defined settlement boundary that is recognisable and likely to be permanent.
 - mitigates impacts on the wider landscape character and maintains the rural setting of Higham and rural views of the site from the from the west and north.
 - maximises habitat creation and enhancement across the site and to the wider ecological network, in particular the priority habitat that runs along the southern boundary.
- Mitigation of the recreational effects of the development on the Thames Estuary and Marshes SPA and Ramsar site.
- A mechanism to secure the long-term habitat, open space and landscape management and maintenance.

5.3.5 The assessment of the proposal will set out how this proposal has sought to address all of these points through the careful design of the development.

5.3.6 It is anticipated that the Regulation 19 Draft Local Plan will shortly be consulted on – with any commentary provided on these suggested allocations (and overall strategy) then fed back to Members for their further consideration.

5.3.7 It should be noted however, that Council Officers have encouraged the submission of this application, in order to assist them with improving the current five-year housing land supply position, and also to demonstrate that this site is deliverable. It is following this advice (received earlier last year) that we started to prepare this application.

Affordable Housing

5.3.8 Policy LP12 of the Regulation 19 Draft Local Plan requires for 50% of dwellings within Green Belt allocations to be provided as affordable units. The Council have identified that this should be provided as the following tenure mix:

- 50% Social Rent (maximised where viable);

- 20% Other Affordable Housing for Rent (including Affordable Rent);
- 30% Affordable Home Ownership (AHO), including Shared Ownership and Discounted Market Sales Housing (First Homes).

Residential Layout Guidelines SPG2

- 5.3.9 The Residential Layout Guidelines (SPG2), originally adopted in February 1996 and amended in June 2020, forms part of the Council's Supplementary Planning Guidance and sets out the Borough Council's adopted standards for residential development.

Design for Gravesham - Design Code SPD

- 5.3.1 The Design for Gravesham - Design Code SPD, adopted in May 2024, provides borough-wide design guidance to support the implementation of Local Plan policies, with specific focus on Policy CS19 'Development and Design Principles'.

5.4 FIVE-YEAR HOUSING LAND SUPPLY

- 5.4.1 NPPF Paragraph 78 is clear that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes.
- 5.4.2 GBC's most recently published housing land supply position in February 2025 identifies only a **3.0 year supply of deliverable housing land**. GBC therefore falls significantly below its required five-year supply of housing land.
- 5.4.3 The latest Housing Delivery Test (2023) results shows that the Borough achieved 59%, confirming a significant under-delivery of housing. In line with the NPPF, a 20% buffer must be applied to the supply of housing.
- 5.4.4 This 2024 NPPF was additionally supplemented by a revised calculation of the Standard Method housing figure to include a stronger affordability multiplier, in addition to removing arbitrary caps and additions to the Standard Method figure. In this context, the Council is now expected to meet a Standard Method figure of 672 homes per annum (Core Strategy identified a maximum of 438 dwellings per annum in 2024 / 2025 – 2027 / 2028). This would equate to a figure of 806 dwellings per annum with the 20% uplift.
- 5.4.5 In the context of NPPF Footnote 8, Policies are considered out-of-date in instances for housing applications where the Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer as noted in NPPF Paragraph 78), and therefore **the presumption in favour of sustainable development applies**.
- 5.4.6 Notwithstanding this position, it is noted that where opportunities exist to deliver new homes on available land within immediate proximity to sustainable settlements, they should be appropriately maximised. In the context of the Government's objective to significantly boost the supply of housing, the Council's annualised housing target is only a minimum figure, it should not represent a cap

that would restrict additional delivery of high-quality homes (including provision of affordable and Self / Custom Build homes) that are sustainably located that can further benefit the Council's housing supply.

- 5.4.7 Further to this, given the status of the Emerging Local Plan, when combined with the Council's significant and long-term housing shortfall, it is vital that the Development Management system intervenes to take a permissive stance towards development and to deliver the homes that are urgently needed in the Borough in the short-term.

6 PLANNING CONSIDERATIONS

6.1 INTRODUCTION

6.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.

6.1.2 In determining whether the proposal accords with the development plan, the following planning policy considerations are assessed in this Section in relation to the proposal:

- (1) National Planning Context;
- (2) The Principle of Development;
- (3) Impact Upon the Landscape and Green Belt;
- (4) Design, Layout, and Scale;
- (5) Heritage Considerations;
- (6) Highways, Parking, and Access;
- (7) Flood Risk and Drainage;
- (8) Landscaping, Trees, Ecology, and Biodiversity Net Gain;
- (9) Developer Contributions; and
- (10) Other Matters.

6.2 NATIONAL PLANNING CONTEXT

6.2.1 In the run up to the General Election in 2024 it was a central plank to Labour's manifesto to "kickstart economic growth". Fundamental to this is the delivery of 1.5 million new homes over the next parliament. To achieve this, mandatory housing targets have been restored and a strategic approach taken to Green Belt release (the most policy constrained land). The new Government's commitment to this, was re-confirmed in the first speech from the Chancellor Rachel Reeves of 08 July 2024.

6.2.2 Subsequently and within 26 days of coming into power, the new Labour Government published for consultation proposed changes to the NPPF and subsequently brought into effect those changes (subject to amendments) on 12 December 2024 (within 6 months), with the publication of the updated NPPF. The changes incorporated underlined central Government's commitment to housing delivery and ensuring housing needs are met locally.

- 6.2.3 Most recently (June 2025) MHCLG has announced £16bn of new public investment to help build of 500,000 new homes. Its purpose is to accelerate housing building and leverage in £53bn of additional private investment creating jobs and homes. Significantly, the Deputy Prime Minister and Housing Secretary Angela Rayner set out that:

"This government is delivering reform and investing in Britain's renewal through our Plan for Change. Our foot is firmly on the accelerator when it comes to making sure a generation is no longer locked out of homeownership – or ensuring children don't have to grow up in unsuitable temporary accommodation and instead have the safe and secure home they deserve."

- 6.2.4 Allied to this, in the June 2025 Spending Review, it was announced that £39bn would be put towards a new 10-year affordable homes programme. This is the biggest boost to investment in social and affordable housing in a generation, looking to address the high housing costs and improving access to safe and decent homes.
- 6.2.5 This increased emphasis on housing delivery (market and affordable) is material to the considerations of these proposals.

6.3 THE PRINCIPLE OF DEVELOPMENT

Development Plan Status

- 6.3.1 The currently adopted Development Plan is in excess of 5 years old. Critically, the Core Strategy Local Plan, which sets out the housing requirement for GBC and long-term spatial vision was adopted in 2014 (i.e., over 11 years ago).
- 6.3.2 Paragraph 34 of the NPPF sets out a legal requirement that Local Plans should be reviewed every 5 years. These reviews should also take place at least once every five years to take account for any changes in circumstances, including changes in National Planning Policy and significant changes in the Local Housing Need figure, such as is the case for this Application.
- 6.3.3 GBC's Local Plan is therefore out-of-date and has not been reviewed or updated to take account of increased housing requirements. The Council is currently preparing a new Local Plan.
- 6.3.4 In the period, the 2024 NPPF was additionally supplemented by a revised calculation of the Standard Method housing figure to include a stronger affordability multiplier, in addition to removing arbitrary caps and additions to the Standard Method figure. In this context, the Council is now expected to meet a Standard Method figure of 672 homes per annum (Core Strategy identified a maximum of 438 dwellings per annum in 2024 / 2025 – 2027 / 2028).
- 6.3.5 The Council have now released their Regulation 19 Draft Local Plan, which includes this site as a draft allocation, under Policy LP7.1C 'Land West of School Lane'.
- 6.3.6 Policy LP7.1c requires primary and secondary or emergency access onto School Lane, coordinated access and active travel links with the adjoining allocation, and

a walking and cycling route connecting to Higham Primary School, the local centre and Higham Railway Station. These access requirements have been incorporated within the proposals.

- 6.3.7 The policy also expects education contributions where required, a landscape-led layout informed by technical assessment, safeguards for residential amenity and heritage assets, and strong green and blue infrastructure with long-term management. The submitted assessments and proposed green infrastructure respond to these requirements, with any necessary contributions, management arrangements and SPA/Ramsar mitigation capable of being secured through planning conditions and, where necessary, planning obligations.
- 6.3.8 Whilst this only carried limited weight at this point in time, given the Council's lack of a five year housing land supply, and given the evidence that underpins its inclusion within the Draft Local Plan (including extensive evidence on landscape/Green Belt impacts), we believe that there would be good reason for the Council to support this application.

Housing Requirement, Supply, and Delivery

- 6.3.9 As set out within the Core Strategy, the housing need figure for Borough sat at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028 (Policy CS02).
- 6.3.10 In this regard, a historic and prolonged constraint to the supply of housing within the Borough is the presence of the Green Belt. In this regard, the Site forms a logical location for development, being situated immediately adjacent to Higham.
- 6.3.11 The Gravesham Green Belt Background Paper further reinforces this position. It notes that the Council's SHLAA (2020) explored all reasonable options for maximising development in the urban area and rural settlements inset from the Green Belt. A high proportion of sites emerging through the SHLAA are similar to those in the current housing land supply (large, previously developed sites). These do not add flexibility to the housing land supply and primarily address high-density flatted accommodation, rather than the need for all types of housing. Given the significant presence of Green Belt within GBC and the lack of development opportunities within the urban area, it is pertinent to now consider sites such as this to assist in meeting the shortfall in housing land supply.
- 6.3.12 GBC is unable to demonstrate a five-year supply of land for housing, with its current position being 3.0 years. The latest Housing Delivery Test results shows that the Borough achieved 59%, confirming a significant under-delivery of housing. This means that both an Action Plan needs to be implemented and a buffer of 20% should be included to the identified supply of specific deliverable sites (as reflected in the Council's Housing Land Supply).
- 6.3.13 Matters of GBC's housing requirement, five-year supply, and most recent Housing Delivery Test result are summarised within Section 5.4 above.

Presumption in Favour of Sustainable Development

- 6.3.14 As confirmed by Core Strategy Policy CS01, which is underpinned by the NPPF (Paragraph 11(d) and Footnote 8), in the absence of a 5-year housing land supply, the presumption in favour of sustainable development is engaged and the policies most important for determining the Application are considered out-of-date. In this instance, this will include Policies restricting development in the countryside, unless material circumstances indicate otherwise.
- 6.3.15 It is demonstrated in this Statement that there are no areas or assets of particular importance that would provide a strong reason for refusing Planning Permission (with particular reference to ecological impacts and flood risk), and additionally there are no adverse impacts that will not be outweighed by the significant and demonstrable benefits of the proposals.
- 6.3.16 Moreover, the current shortfall in housing has no immediate prospect of being remedied in the absence of an up-to-date Local Plan, delays in the preparation of a new Local Plan and as a result of a significant increase in housing delivery requirements.
- 6.3.17 The delivery of this Site would provide an immediate and substantial uplift to the Council's housing land supply (and subsequent housing delivery), which would assist the Council in deterring speculative developments in less sustainable locations during a period where their Plan is not up-to-date and would also support the Council in demonstrating that the proposed allocations within their Draft Local Plan are deliverable.
- 6.3.18 The proposals would provide a substantial addition to housing provision within a Borough that is in "presumption" and would provide much-needed market and affordable (at 50% in line with the NPPF) homes. In the context of this, and the NPPF, the principle of development on this Site is therefore deemed acceptable.

Development in the Countryside

- 6.3.19 Policy CS02 of the Core Strategy sets out that the development will be distributed to urban areas. In the rural area, development will be supported within rural settlements inset from the Green Belt, development outside those settlements will be supported where it is compatible with National Policies for protecting the Green Belt. In this regard, the Site immediately adjoins the settlement boundary of Higham to the south and is therefore considered 'open countryside' in planning terms.
- 6.3.20 Consequently, it is acknowledged that there would be some conflict between Policy CS02 and the development. However, following the application of the presumption, these Policies are considered to be 'out-of-date' in accordance with the NPPF (Paragraph 11(d)).
- 6.3.21 Outside Gravesend and Northfleet, the Borough is predominantly rural, with 78% of the Borough designated as part of the London Metropolitan Green Belt. As noted in Paragraph 2.3.5 of the Local Plan, whilst a significant amount of the Borough is rural, there are few particularly remote areas. Some of the larger rural settlements are comparatively self-sufficient in terms of local services.

- 6.3.22 Higham is identified in the adopted Development Plan as a Larger Village, supported by a number of valued services, including primary school, post office, small shops, and bus service linking the settlement to Gravesend and the Medway towns
- 6.3.23 The Emerging Local Plan is informed by the Settlement Hierarchy Background Paper (October 2020), which classifies Higham as a Type 2 settlement. Although the updated scoring system records that Higham contains four key services, convenience stores, a post office, a GP surgery and a frequent bus service, this reflects the technical reassignment of the primary school and meeting hall to Lower Higham rather than any material reduction in local provision.
- 6.3.24 Crucially, the Background Paper emphasises the functional relationship between Higham and Lower Higham, noting their close proximity and the shared reliance of residents on facilities in both locations. The separation between the two centres is only around 1,200m (between Higham village centre and Lower Higham Station), meaning that services, amenities and public transport options operate effectively across the two settlements. The Paper therefore proposes that this relationship should be “capitalised on” through the creation of a clustered settlement structure that recognises the combined service offer of both locations.
- 6.3.25 The application site lies to the north of Higham within the existing gap between Higham and Lower Higham, placing it directly within this emerging clustered settlement pattern. Its location, circa 1km from Higham Railway Station in Lower Higham, provides convenient access to regular rail services and ensures that future residents can benefit from the full range of services and facilities identified across both settlements. It should be noted that the Council are seeking to effectively ‘link’ Higham and Lower Higham with new development that is allocated within their Draft Local Plan, which would close this gap in any event. These allocations would allow for a contiguous built form from Higham to Lower Higham and would remove any separation when travelling between the two currently distinct settlements.
- 6.3.26 The NPPF (at Paragraph 110) requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Further to this, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, which should be taken into account in Decision Making. It is additionally highlighted that there has been an increased uptake in working from home arrangements and the delivery of groceries directly to the home, which further reduces the reliance on the private car.
- 6.3.27 Taken together, the adopted strategy, the Emerging Local Plan evidence base and the NPPF all support the conclusion that Higham (and by proximity, the Site), represents a sustainable location for development. The site is well-placed to take advantage of the combined service provision and transport connections of the proposed clustered settlement, and its sustainability credentials are summarised below.
- 6.3.28 The Chartered Institution for Highways and Transportation (CIHT) document ‘Providing for Journeys on Foot’ suggests acceptable walking distance which are relevant for a variety of journey purposes.

- 6.3.29 For commuting or school trips, 1,000 metres is suggested as an acceptable walking distance, equating to approximately a 12-minute walk. Within this distance from the Site, residents can access a variety of day-to-day services and facilities, including educational establishments, bus stops, shops, convenience store, public houses, restaurants, and a place of worship.
- 6.3.30 The guidance also identifies 2 kilometres as a preferred maximum walking distance, approximately a 25-minute walk. Within this distance, future residents would have access to a wide range of services and facilities considered realistic for day-to-day needs, including additional schools, Higham Railway Station and the full extents of Higham (including Lower Higham).
- 6.3.31 As noted above, there are a number of PRoWs within proximity of the Site, including the Restricted Byway (Reference: NS153) which bisects the Site in an east-west configuration. To the east this provides a connection to Public Footpath (Reference: NS184) which facilitates connections northward, eastward, and southward. Efforts have been made to incorporate and enhance existing pedestrian infrastructure within the proposal, encouraging safe and sustainable movement.
- 6.3.32 In light of the above, the Site therefore has the potential to offer numerous non-car travel links within Higham subject to appropriate new connections and crossing points to surrounding pedestrian infrastructure. Moreover, the Site is in close proximity to an active Train Station, which in turn provides connections to immediately neighbouring settlements in addition to providing regular connections to the surroundings Medway Towns and London via 'Southern'.
- 6.3.33 Despite the Site being located in an area of transition to the countryside, it is well located in relation to bus stops. Local bus routes (111, 311 and 417) provide regular connections to surrounding towns, with the nearest bus stop being within 250 metres of the Site.
- 6.3.34 The above transport nodes therefore offer extensive opportunities for modal interchange possibilities and would therefore be a realistic option of travel for development residents for both commuting, medical, and leisure purposes.
- 6.3.35 In conclusion, the Site is accessible by a variety of sustainable modes of transport (with a number of journeys being able to be completed via multi-modal trips), the Site can therefore be considered to be a sustainable location with regards to sustainable travel.
- 6.3.36 'Grey Belt' excludes land where the application of the Policies relating to the areas or assets in Footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Having regard to the above, the Site is not in a National Landscape nor any other asset covered in Footnote 7. Therefore, the role and function of the Site in the context of the extent to which it serves the following purposes must be considered:
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another; and*
 - d) to preserve the setting and special character of historic towns.*

- 6.3.37 Having regard to these requirements, the Site is effectively enclosed by a vegetated northern boundary and existing residential development, giving it a character which lends itself to being a natural extension of the existing built-up area. It additionally provides the potential for greater boundary landscaping and opportunities to further open up access to the Site, with scope for pedestrian linkages, joining the existing public footpath network.

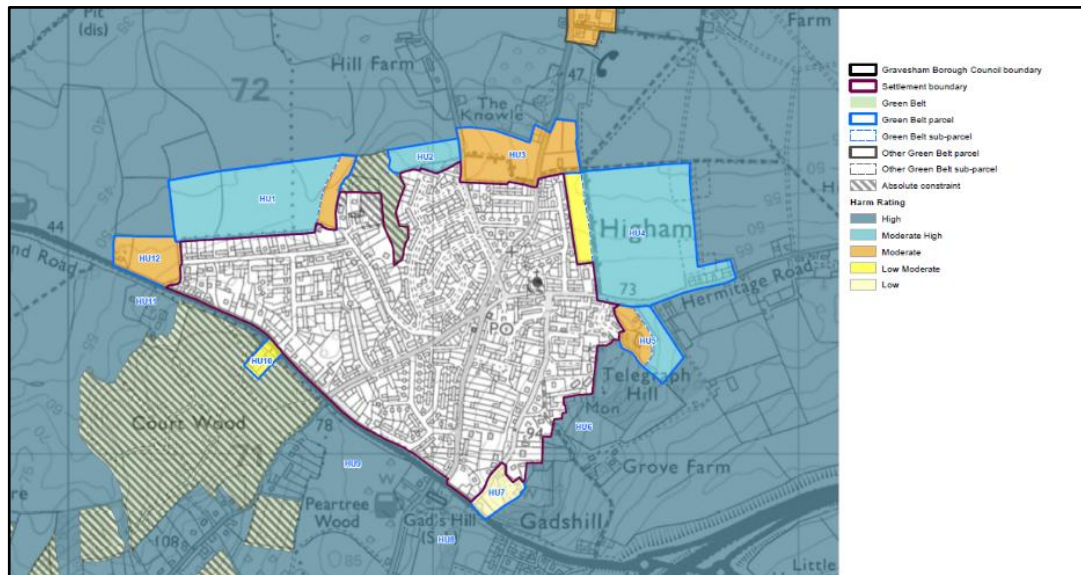


FIGURE 6.1. OVERLAY FROM GRAVESHAM'S GREEN BELT REVIEW

- 6.3.38 The Council's own Green Belt Review (1 and 2) identifies this part of Higham as having moderate harm should development come forward, with this parcel (HU3) being at the lower end of the harm identified. As part of this submission, the applicant has commissioned their own Green Belt Assessment that also concludes that:

'The development of the Site was also found not to undermine all five of the Green Belt purposes taken together over the Local Plan area, and therefore taking all of these factors into consideration, we believe that the Site fully meets the definition of Grey Belt, as highlighted within Para 009 of the PPG (2025), and as a result, development of the Site would not be considered inappropriate according to paragraph 155 of the NPPF.'

It is judged that given the small size of the Site in relation to the wider Green Belt parcels within which it lies, as well as the lack of large built up areas and towns within the immediate setting of the Site, the proposed development of the Site would also not in our opinion, prevent the wider Green Belt from serving the five purposes of the Green Belt.'

- 6.3.39 This aligns with the Council's own assessment of the site and justifies the inclusion of this site within the Regulation 19 Draft Local Plan.
- 6.3.40 For reasons set out above, the development would be 'appropriate' in the Green Belt and is not reliant upon a case of very special circumstances ('VSCs').

¹ Paragraphs 7.2 and 7.3 of the Green Belt Assessment 2025 (Nicholsons)

- 6.3.41 In addition, the proposed development is set on a medium sized and unconstrained Site. Its inclusion as part of the supply would contribute to diversifying the housing land supply portfolio and can make an important contribution towards meeting housing requirements. The Site would make a significant and suitable contribution to meeting the Borough's housing need (both market and affordable), whilst being located in a sustainable location in addition supporting the vitality of Higham.
- 6.3.42 The proposals would provide for 50% affordable homes in line with the NPPF's 'Golden Rules' for Grey Belt Development and compliance with Policy CS16 of the Local Plan. The provision of affordable housing is a matter in which the NPPF places specific emphasis on when considering the benefits of development in the planning balance (NPPF Paragraph 11(ii)). It is of note that this was a specific addition to the NPPF when it was updated in December 2024, alongside taking into other considerations, such as making the most effective use of land and directing development to sustainable locations. Accordingly, substantial weight should be attributed to the provision of affordable housing in the planning balance.
- 6.3.43 The Borough is constrained and to meet its housing requirement, it is inevitable that settlements such as Higham will need to accommodate additional housing in the future to meet identified significant housing needs, as recognised through the emerging Local Plan.

Summary of Principle of Development

- 6.3.44 In summary the Site is located within a sustainable location, which has been confirmed by its allocation within the Council's emerging Regulation 19 Local Plan. It has opportunities to maximise sustainable transport solutions as highlighted further within the accompanying transport reports.
- 6.3.45 There is an acute need for housing within Gravesham, demonstrated by a significant and worsening lack of housing land supply. This Site can make a sustainable, positive, and immediate contribution. The Site forms a logical and sustainable extension to Higham, located immediately adjacent to the development boundary. It is not the subject of any absolute development constraints and is otherwise a suitable site to deliver an appropriate and sensitively designed scheme that could be brought forward at pace.
- 6.3.46 Unlike much of the Borough, the Site is not constrained by matters of landscape and flooding. Higham has limited other significant growth opportunities (that have not already been included as part of the committed supply) due to the extent of constraints within the Borough. As a result of this, sites for development around the edges of settlements, such as this one, should be considered favourably to help provide an important contribution to the Borough's housing supply.
- 6.3.47 Whilst the Site is currently considered "countryside", it is noted that this Policy is 'out-of-date' in accordance with the NPPF.
- 6.3.48 Given the lack of five-year housing land supply, there is a presumption in favour of sustainable development and the provision of housing should be given significant weight in the determination of this Application.

6.4 IMPACT UPON THE LANDSCAPE

- 6.4.1 A Landscape and Visual Impact Appraisal (LVIA) has been prepared by Nicholsons and is submitted as part of the Application.
- 6.4.2 Notably, the proposed housing would reflect the rural settlement edge character of these existing views. It would be set back from the Site boundaries and within a strong framework of green infrastructure with a strong semi-natural character. Views of the new built form would be typically filtered and visually softened by retained/enhanced site periphery vegetation.
- 6.4.3 The existing framework of Site vegetation would be substantially retained to help conserve rural character and would be supplemented by new tree / shrub vegetation for landscape and visual integration, as set out in the Landscape Strategy. The full detail of these landscape proposals will be secured at Reserved Matters stage.

Summary of Landscape Impacts

- 6.4.4 The landscape impact assessment concluded that the Site's relationship with its landscape setting is largely influenced by the immediate settlement edge to the south, east, west and north-eastern corner. Whilst the Site is largely contained by mature vegetation or built form, it is acknowledged that the open section of western boundary allows the Site to have some interaction with the open countryside to the north-west.
- 6.4.5 The greatest adverse landscape impacts identified were upon the arable use of the Site and its overall landscape character, both of which are anticipated to experience an adverse effect of Moderate significance.
- 6.4.6 However, it is judged that the Site feels relatively isolated from the wider arable countryside, and therefore its influence beyond its immediate setting is limited.
- 6.4.7 Additionally, it is judged that the inclusion of a robust landscape scheme could reduce these effects over time, as the planting matures.
- 6.4.8 All other landscape receptors scored either a Moderate/Minor or Minor adverse score, and are therefore considered to be of lesser relevance

Summary of Visual Impacts

- 6.4.9 The visual impact assessment concluded that the visual envelope of the Site is largely confined to the immediate residential setting of the Site to the south, with some adjacent residential views from Taylors Lane to the west and School Lane to the east and north-east.
- 6.4.10 The greatest adverse visual impacts identified were upon residents of High View and users of Restricted Byway NS153, who are anticipated to experience an adverse effect of Moderate significance as a result of the close proximity of these dwellings and gardens to the Site, and the location of the byway within the Site

- 6.4.11 All other visual receptors scored either a Moderate/Minor or Minor adverse score, and are therefore considered to be of lesser significance.
- 6.4.12 It is judged that the inclusion of a robust landscape strategy, including hedgerow and tree planting along the Site's southern boundary, will help to settle the proposed development into the existing landscape and townscape, whilst providing wider biodiversity and green infrastructure benefits.
- 6.4.13 Overall, the landscape strategy aligns with Policies CS02, CS12 and CS19 by protecting rural character, strengthening green infrastructure and responding appropriately to the settlement edge. Furthermore, the proposals are not within and would not give risk to any harm to a protected landscape (NPPF Paragraph 189) or a valued landscape (NPPF Paragraph 187).

6.5 DESIGN, LAYOUT, AND SCALE

- 6.5.1 Whilst exact details will be confirmed at Reserved Matters stage, the submitted suite of Parameter Plans provide a framework for an appropriate detailed design, as illustrated in the DAS. It identifies residential development predominantly within the central and southern parts of the Site where levels are most suitable and where the layout can relate well to existing settlement edges. The Plan also shows extensive areas of open space and landscape buffers, particularly along the northern boundary and the western edge adjoining Taylors Lane, creating a softer visual impact and a clear transition to the surrounding countryside.
- 6.5.2 Built development is positioned where topography permits for an efficient and coherent layout. The western part of the Site sits at a higher level and therefore includes set-back development. To the east, access is taken from School Lane, where the land gently falls, and properties are arranged to create an active and well-overlooked frontage. Additional landscape buffers are provided along southern boundaries where the Site adjoins existing rear gardens, ensuring privacy and amenity are respected.
- 6.5.3 Within the Site, the main spine road forms a looping route that connects all development parcels and the key open spaces (including L1, L3, L5 and L6). The character of the road will be landscape-led, incorporating street trees, green verges and building frontages to create a coherent hierarchy of streets. Pedestrian connections are strengthened through enhancements to PRoW NS153, which provides an east-west link across the Site.
- 6.5.4 Visually, the DAS demonstrates how the layout responds to the Site's landform, existing boundary vegetation and ecological features. The perimeter blocks are arranged to respect these constraints, with the form and scale of buildings shaped by topography, particularly the higher ground to the west, and by the need to maintain a soft, landscape-dominated northern edge.
- 6.5.5 The developable area will deliver strong, outward-facing frontages to the public realm while ensuring the amenity of existing neighbours is safeguarded through appropriate separation distances. As shown in the DAS, building heights will be no greater than two storeys, reflecting the surrounding village-edge character, with only limited opportunities for variation where topography and layout permit.

- 6.5.6 Matters of appearance are also reserved, but it is anticipated that reference will be taken from the surrounding character of the village. Indicative materials include brick, render and tile, reflecting the local palette identified in the character assessment. The DAS confirms that the proposed density aligns with nearby residential patterns which will be consistent with the character of the local area, whilst making the most efficient use of the Site.
- 6.5.7 Development of up to 50 homes, including 50% affordable housing, is considered acceptable in principle and capable of providing a sensitive addition to Higham. The proposals respond positively to local character and topography and are consistent with achieving a high-quality, sustainable and attractive place to live.
- 6.5.8 A mix of housing types, tenures, and sizes will be provided in detail with a Reserved Matters Application. However, it is highlighted that the development will provide for a balanced mix of housing, which will be informed by the relevant Planning Policies, in addition to complying with relevant requirements for Affordable Housing.
- 6.5.9 Taking the above into account, the proposal demonstrates that it can deliver a suitable mix of market and affordable housing that responds to the Site, reflects the needs within the Borough and village, contributes to the creation of balanced and mixed communities, as well as responds to the character and setting of the local area.

6.6 HERITAGE CONSIDERATIONS

Built Heritage

- 6.6.1 With regard to built heritage, it is highlighted that the NPPF notes that Councils should look for opportunities for new development to enhance or better reveal the significance of Heritage Assets.
- 6.6.2 In this regard, a Heritage Statement (HS) has been prepared by Smith Jenkins Planning & Heritage and is submitted as part of the Application.
- 6.6.3 In accordance with paragraph 207 of the NPPF, the significance of the designated and non-designated heritage assets which have the potential to be affected by the application proposals have been described in this statement. A clear understanding and appreciation of the significance of the heritage assets has informed the evolution of the proposals.
- 6.6.4 Notably, mitigation for potential heritage impacts has been embedded within the outline proposals and secured through submitted parameter plans. This includes the restriction of built development away from the northern boundary adjoining the Knowle, the retention of landscape buffers and open space, the control of access arrangements and movement/viewing corridors. Further detailed mitigation, including boundary treatments, landscaping and building heights, would be secured at the reserved matters stage and would be required to accord with the parameters assessed in this statement.
- 6.6.5 This Heritage Statement has concluded that, when assessed on a parameter-based worst-case scenario appropriate to an outline application, the application

proposals preserve the significance of the Grade II listed Church of St John and The Knowle NDHA.

- 6.6.6 Therefore, the proposals are in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, NPPF (2024) and Local Policy CS19, which requires development to respect and reinforce heritage character

Archaeology

- 6.6.7 The Application is accompanied by an Archaeological Desk-Based Assessment (DBA), prepared by Tetra Tech.
- 6.6.8 The assessment provides a review of the site's below-ground archaeological potential and addresses the information requirements of national, regional and local planning policy.
- 6.6.9 In terms of relevant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefields or Historic Wrecks lie on within the vicinity of the study site.
- 6.6.10 Almost the entirety of the site lies within an Archaeological Notification Area (ANA) that is defined as: "*moderate palaeolithic potential; an area of multi period background potential*".
- 6.6.11 The northwest corner of the site falls within a second ANA defined as: "*some palaeolithic potential; an area of multi period background potential*".
- 6.6.12 The Kent HER records a non-designated archaeological asset within the site comprising the earthwork remains of a Post Medieval field boundary, recorded from aerial photographs. In the context of the Secretary of State's non-statutory criteria for Scheduled Monuments (DCMS 2013), this asset can be identified as of negligible to minor archaeological significance.
- 6.6.13 In terms of further yet-to-be-discovered archaeological remains, the available evidence indicates the site has a low to moderate potential for Prehistoric remains to be present, and a low potential for significant remains from all other past periods of human activity. Should any such remains survive within the site, they can be anticipated to be of overall low/local significance and no more than moderate/regional significance.
- 6.6.14 In view of the study site's known archaeological resource and its identified archaeological potential, development within the site boundary can currently be assessed as unlikely to result in significant harm.
- 6.6.15 Given the above, it is suggested that any archaeological investigation required by the Local Planning Authority could follow planning permission secured by an appropriately worded planning condition.

6.7 HIGHWAYS, PARKING, AND ACCESS

- 6.7.1 This Application is accompanied by a Transport Assessment (TA), prepared by DHA Planning.
- 6.7.2 Formal Pre-Application advice was issued by KCC Highways on the 27th November 2025 and has informed the scope and content of the TA.
- 6.7.3 The proposed development complies with all relevant national and local transport planning policies. The site enjoys good access to the local highway network and is sustainably located for a rural location, with good connections to existing pedestrian infrastructure and public transport nodes, as well as to everyday facilities and services within Higham, in accordance with Paragraphs 110, 115, 148 and 155 of the NPPF.
- 6.7.4 The development will be supported by a Travel Information Pack, which will promote sustainable travel behaviour amongst future residents. The scheme also will make improvements to external local pedestrian infrastructure.
- 6.7.5 Vehicle and cycle parking will be provided in accordance with SPG4 and KCC's latest 2025 Parking Standards.
- 6.7.6 A review of the latest five-year Personal Injury Collision data for the local highway network confirms that the proposed development should not have any material adverse impacts in this regard.
- 6.7.7 The proposed site access design has been prepared with reference to the applicable highway standards and has been subject to an independent Stage 1 Road Safety Audit, in which all outstanding issues have been addressed.
- 6.7.8 The proposed development with the vision-based mode shift reduction, is projected to generate a maximum of 196 vehicle movements over the 12-hour weekday period (07:00-19:00), including 22 in the AM peak hour and 23 in the PM peak hour. Overall, this would equate to an additional 16 vehicle trips per hour – or one every three to four minutes – on average, which would not have a significant or 'severe' residual impact on the operation of the local highway network with reference to Paragraph 116 of the NPPF.
- 6.7.9 Given the above, it is concluded that the proposed development should not have any material adverse transport impacts and therefore the proposals are entirely in line with the NPPF, Core Strategy Policy CS11 and Saved Policies T1, T5 and P3.

6.8 FLOOD RISK AND DRAINAGE

Flood Risk

- 6.8.1 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by DHA Planning and is submitted as part of the Application.
- 6.8.2 This followed a pre-Application meeting held with KCC (Lead Local Flood Authority), where the principles of the disposal for the surface water were agreed

based on the standards and underpinning principles set out in the National Standards for Sustainable Drainage Systems dated 30th July 2025.

- 6.8.3 The site-specific flood risk assessment determined that the area of the site to be developed to be entirely within Flood Zone 1; low risk of flooding from rivers. The site is not at risk from any other sources of flooding.
- 6.8.4 NPPF Annex 3: "Flood Risk Vulnerability Classification", states that sites used for residential use can be classified as "more vulnerable".
- 6.8.5 Given the development will be located entirely within Flood Zone 1, the site is considered to have passed the Sequential Test. More vulnerable development is appropriate in Flood Zone, and an Exception Test is not required.
- 6.8.6 The online British Geological Survey maps indicate that the site is underlain by bedrock geology comprising of the Seaford Chalk Formation (Chalk). Shallow infiltration testing was initially carried out at depths of between 0.5 and 4m below ground and provided low to very low infiltration rates across the site. Further deep bored testing was carried out in two locations at depths up to 20m which provided very good soakage potential. Deep bored soakaways are therefore considered feasible on the site.

Surface Water Drainage

- 6.8.7 A Sustainable Urban Drainage System (SuDS) has been provided as part of the surface water drainage layout to deal with the surface water generated from the development to ensure that flood risk is not increased elsewhere. The site will be split into two surface water catchments based on the existing topography. For both catchments, roof areas will drain direct to adjacent areas of private hardstanding constructed as an unlined porous pavement. These will discharge to a network of gravity surface water sewers into an underground cellular storage tank with an outfall to deep bored soakaways.

Foul Drainage

- 6.8.8 The foul drainage for the development has been shown draining to the existing 175mm diameter sewer located in School Lane. An onsite foul water pumping station will be required to drain the western part of the site.
- 6.8.9 As such the proposals accord with the requirements of the NPPF, PPG and the National standards for sustainable drainage systems (SuDS) in respect of securing a suitable and sustainable drainage strategy for the development. Additionally, the proposals are consistent with Local Policies CS18 and CS19.

6.9 LANDSCAPING, TREES, ECOLOGY, AND BIODIVERSITY NET GAIN

Landscaping

- 6.9.1 Core Strategy Policy CS12 sets out that the Borough's overall landscape character and valued landscapes will be conserved, restored and enhanced.

- 6.9.2 The indicative landscape strategy accompanying the Application has been informed through a thorough review of the landscape context of the Site and surrounding area. The landscape proposals have sought to build on the local landscape character by integrating generous green spaces and landscaped buffers throughout the development. These areas are carefully arranged to create an attractive setting while accommodating drainage features and ecological enhancements.
- 6.9.3 The Parameter Plans have been designed to provide a series of areas for open space. As such, in the north-eastern and north-western extents of the Site, large areas of open space are provided. These areas are designed to incorporate informal play spaces, ensuring functionality alongside visual amenity.
- 6.9.4 Landscape buffers are to be retained and enhanced within the Site and to the boundaries with soft landscaping (i.e., hedges, low planting, and trees) to assist with the transition to the countryside and to reduce the visual impact of built form.
- 6.9.5 In light of the above, it is considered that the proposals are entirely compliant with Core Strategy Policies CS12, CS13 and CS19 by strengthening green infrastructure, providing adequate open space and ensuring a sensitive transition to the countryside. Saved Policy LT5 is met through appropriate open space provision.

Trees

- 6.9.6 An Arboricultural Impact Report (AIR) has been prepared by Plumb Associates to accompany the Application.
- 6.9.7 A site survey was undertaken on the 18th December 2025, whereby trees were assessed in accordance with recommendations and guidelines contained within British Standard 5837:2012 - 'Trees in relation to design, demolition and construction-Recommendations'.
- 6.9.8 The proposed scheme layout has been designed to avoid any direct impact on the trees, woodland and hedge. The proposal would have no indirect impacts on any surrounding trees if the measures set out in the Arboricultural Method Statement are followed. Additionally, the landscape scheme would result in a significant increase in the number of trees on site
- 6.9.9 In considering this, the scheme is considered to comply with NPPF Paragraphs 136, 162, and 193(c).

Ecology

- 6.9.10 An Ecological Appraisal (EA) has been undertaken by Plumb Associates, with a site survey undertaken on 18th June 2025.
- 6.9.11 The survey concluded that the site currently has a low ecological value and the proposed development would not impact any habitat of importance and have no adverse effects on protected species so long as the proposed precautionary mitigation measures are followed for badgers and nesting birds.
- 6.9.12 The site is adjacent to woodland and a hedge which are suitable for commuting and foraging bats. Accordingly, external lighting should be designed in accordance

with Bats and Artificial Lighting at Night Guidance Note 08/23 prepared by the Institute of Lighting Professionals and Bat Conservation Trust. The details can be secured by condition.

- 6.9.13 With regard to the above, no further surveys are required and it is considered that the proposed development is in complete accordance with Core Strategy Policies CS12 and CS19 and the NPPF.

Biodiversity Net Gain (BNG)

- 6.9.14 For developments in England, Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). As a result of this, developers must deliver a BNG of 10%, ensuring that developments will result in more or better-quality natural habitat than there was prior to the development.
- 6.9.15 As a result of this, a BNG Assessment has been prepared and submitted as part of the Application. The BNG Assessment provides an assessment and calculation of biodiversity units pre- and post-development in the context of the mitigation hierarchy.
- 6.9.16 In view of the above, it is considered that the development as proposed is entirely in accordance with all relevant National and Local Policy relating to landscaping, trees, ecology, and Biodiversity Net Gain.

6.10 DRAFT HEADS OF TERMS AND DEVELOPER CONTRIBUTIONS

- 6.10.1 To mitigate the impacts of development on local infrastructure (i.e., such as schools), appropriate contributions will be secured, where necessary, through a planning obligation under Section 106 of the Town and Country Planning Act 1990 (as amended).
- 6.10.2 The Council's pre-application response highlighted the potential for Section 106 contributions in relation to education, libraries, social services and waste. Given the time that has elapsed since that advice, an updated position from the relevant consultees is awaited and draft Heads of Terms will be provided once the scope and quantum of any necessary contributions have been confirmed through the ongoing determination discussions.
- 6.10.3 Accordingly, the above will be subject to discussions with GBC and any contributions will specifically mitigate the impacts of the development in accordance with NPPF Paragraph 58.

6.11 OTHER MATTERS

Ground Conditions

- 6.11.1 A Preliminary Risk Assessment (PRA) Desk Study, prepared by Jomas Associates, has been submitted in support of the application.

- 6.11.2 This PRA was undertaken to identify the nature and potential extent of any contaminants at the Site, to determine whether any significant contaminant linkages exist in line with Environment Agency LCRM guidance and the NPPF, and to assess whether the Site is safe and suitable for its intended use or could be made so through appropriate remedial measures.
- 6.11.3 No significant contaminant sources were identified through the desk study or site walkover. The risk estimation matrix categorises the Site as presenting a “Low” to “Low/Moderate risk”. Consequently, a ground investigation is not considered necessary for contamination risk assessment at this stage. A precautionary watching brief should, however, be maintained during any groundworks, with any unexpected materials reported immediately to the Local Authority and a suitably qualified environmental consultant.
- 6.11.4 Overall, the PRA concludes that there are not likely to be any significant risks to health or the environment from land contamination in either the current usage or proposed usage. The Site is considered to be suitable for its intended use.

External Lighting

- 6.11.5 An External Lighting Statement has been prepared by BSE 3D to accompany the Application.
- 6.11.6 This External Lighting Statement demonstrates that, based on the indicative information submitted in support of the outline application, the proposed residential development is capable of accommodating an external lighting approach in principle, having regard to residential amenity and relevant guidance.
- 6.11.7 At outline stage, the assessment confirms that sufficient flexibility is retained to enable detailed lighting matters to be considered and resolved at subsequent stages of the planning process.
- 6.11.8 On this basis, external lighting does not represent an in-principle constraint to the grant of outline planning permission.

Air Quality

- 6.11.9 An Air Quality Assessment (AQA) has been prepared by Air Quality Experts Limited to accompany the Application
- 6.11.10 The proposed development does not raise any significant adverse impacts on the health and/or quality of life for any existing or proposed receptors, as a result of any anticipated changes to air quality.
- 6.11.11 A construction dust risk assessment has been undertaken for the three stages of construction activities associated with the proposed development in accordance with IAQM guidance on the assessment of dust from construction activities
- 6.11.12 Mitigation measures have been proposed for construction traffic and stationary plant associated with the proposed development.
- 6.11.13 Following the successful implementation of the specific mitigation measures, the residual effects of construction dust and emissions from construction

plant/vehicles upon the local area and sensitive receptors although adverse, will be temporary and considered to be 'not significant'.

- 6.11.14 It is therefore concluded that the proposed development complies fully with air quality related national and local planning policy and any mitigation can, if considered necessary, be enforced by means of appropriate planning conditions, consistent with paragraphs 55 and 56 of the National Planning Policy Framework.

Noise

- 6.11.15 A Noise Assessment has been prepared by Quantum Acoustics to establish the existing noise levels characterising the proposed development site.
- 6.11.16 The measurement results indicate that noise levels are dominated by road traffic noise from School Lane (which runs along the eastern boundary of the site), with noise levels reducing with increasing distance from the road.
- 6.11.17 The potential risk of the site has been assessed in line ProPG Stage 1 and Stage 2 assessments.
- 6.11.18 The Stage 1 assessment concludes that the site has a "*negligible*" to "*low*" daytime noise risk and "*negligible*" to "*low/medium*" night-time noise risk.
- 6.11.19 The Stage 2 assessment concludes:
- The illustrative framework masterplan embeds good acoustic design principles to mitigate noise levels;
 - The proposed development can be designed to deliver appropriate internal noise levels for all modes of ventilation. Detailed design proposals will need to be developed at the detailed design stage of the scheme. The LPA can retain planning control over such proposals either through the Reserved Matters process or use an appropriate planning condition;
 - The illustrative land use parameter plans embed the ability to provide appropriate detailed design strategies for providing access to good quality external amenity space for future residents;
 - The required mitigation strategies should not create any unintended adverse consequences for future residents the proposed development is therefore considered to comply fully with relevant national and local planning policy; and
 - The proposed development does not raise any agent of change concerns in relation to existing neighbouring business or community use facilities.
- 6.11.20 It is concluded that the proposed development should not raise any residual significant adverse impacts on health and/or quality of life for future occupiers of the proposed development or existing neighbouring dwellings, and that the proposed development follows an intelligent, design led approach to reduce and minimise noise.
- 6.11.21 In light of this, it is considered that the proposals are acceptable in terms of noise impact quality and therefore entirely compliant with NPPF Paragraph 198.

Agricultural Land Classification

- 6.11.22 An Agricultural Land Classification Survey has been undertaken by Terra Analytical UK.
- 6.11.23 The survey was carried out in January 2026 under a format that follows the 1988 MAFF guidelines for assessing Agricultural Land Classification and assessing limitations.
- 6.11.24 The agricultural land on the site has been classified as mainly deep medium textured sandy loam topsoils with moderately draining sandy loam subsoils.
- 6.11.25 Due to these properties coupled with climactic data, soil droughtiness and stoniness, the quality of the 2.8 hectares of agricultural land over the area is deemed Agricultural ALC Grade 3a (100%).

Health Impact Assessment

- 6.11.26 The Rapid Health Impact Assessment Matrix submitted with the application indicates that the proposal is anticipated to result in an overall positive health effect.
- 6.11.27 This is primarily driven by the provision of public open space and a play area, retention of the existing restricted byway, and delivery of wider environmental benefits and a commitment to at least 10% biodiversity net gain.
- 6.11.28 The Matrix also highlights that a number of detailed health determinants, such as housing quality/space standards, accessibility and adaptability, energy efficiency, thermal comfort and renewable technologies, will be confirmed at Reserved Matters in accordance with the relevant development plan policies.
- 6.11.29 Potential short-term adverse impacts associated with construction activity are expected to be mitigated via a conditioned Construction and Environmental Management Plan (CEMP), while any implications for health and education services will be addressed through statutory consultation with the NHS and Education Authority and, where necessary, secured through S106 contributions,

Energy and Sustainability

- 6.11.30 The proposed homes would be constructed to be resilient to the impact of climate change. The Application is accompanied by an Energy and Sustainability Statement (ESS), prepared by BSE 3D Ltd.
- 6.11.31 The strategy has been developed using a fabric-first approach, prioritising enhanced building envelope performance to minimise energy demand before incorporating low-carbon technologies.
- 6.11.32 In addition to carbon reduction measures, the development incorporates water efficiency standards achieving 110 litres per person per day in accordance with Approved Document G recommendations
- 6.11.33 The approach is consistent with Policies CS18 and CS19 by reducing energy demand and incorporating sustainable construction principles.

7 SUSTAINABLE DEVELOPMENT AND PLANNING BALANCE

7.1 SUSTAINABILITY

- 7.1.1 The NPPF, (paragraph 8) provides the Government's overarching objectives for achieving 'sustainable development', which includes economic, social and environmental objectives. The proposals contribute to sustainable development through the following overarching sustainability objectives:
- **Economic** – The development will make a significant contribution to the local economy through job creation during the construction and operational phases of the development, in addition to providing S106 contributions and generating new Council Tax revenue and New Homes Bonus receipts.
 - **Social** – The development will provide much needed homes to meet the needs of present and future generations. Furthermore, it will secure the provision of a well-designed and high-quality environment that will provide accessible open space supporting the community's health, social and cultural wellbeing.
 - **Environmental** – This Outline Application has demonstrated that the proposed development has been designed to ensure that matters of ecology and the environment would not constrain development. The development will make effective use of land, whilst providing biodiversity net gain.

7.2 PLANNING BALANCE

- 7.2.1 As established throughout this Statement, the development as proposed under this Application will clearly represent an entirely sustainable and appropriate form of development.
- 7.2.2 GBC's Local Plan is out-of-date. The Council cannot demonstrate, nor have any reasonable prospect of demonstrating a 5-year housing land supply within the immediate future, which in the absence of a new Local Plan is a situation that is expected to worsen.
- 7.2.3 However, the site has now been included within the Council's Regulation 19 Draft Local Plan as an allocation suitable for approximately 60 dwellings. The Council has undertaken a Green Belt Review which identifies this site as being capable of being developed within limited impact upon the character and appearance of the area and the functioning of the Green Belt as a whole.
- 7.2.4 This together with the lack of a current five year housing land supply (and the presumption of the 'tilted balance') (NPPF Paragraph 11 (d)) means that for decision-taking, the Council should approve the Application unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In doing so the Council should undertake a simple balancing exercise between the positive and negative factors related to the proposed development.

- 7.2.5 The proposed development would deliver up to 50 new homes, including 50% affordable homes, representing a substantial and urgently needed contribution to meeting Gravesham's housing needs. Significant weight must be given to the delivery of both market and affordable housing in an authority with persistent under-delivery, an unmet housing need, and an absence of a five-year housing land supply.
- 7.2.6 As noted within this Statement, the proposed development contributes to a number of the core objectives of the adopted Development Plan. Where the proposals do not fully comply with Policies, these Policies are out-of-date where they restrict development coming forward and as a result attract limited weight in the planning balance. Notwithstanding this, it is reiterated that the Site comprises a Draft Allocation (Policy LP7.1F) under the Regulation 19 Draft Local Plan which provides indicative support for the residential development of the Site.
- 7.2.7 Whilst it is acknowledged that the Site currently lies beyond established development boundaries, it is clear that the established settlement boundaries are unable to deliver for the full housing need. It is therefore clear that decision makers must look beyond these development boundaries, particularly in instances where sites are not the subject of absolute planning constraints. The development of the Site would support sustainable growth and support the vitality of an existing settlement whilst providing direct benefits to the Borough, without giving rise to any material adverse impacts to the character of the area, landscape, or neighbouring amenity.
- 7.2.8 In the interests of clarity, it is highlighted that there are numerous and substantial benefits that must be weighed in favour of the proposals, including:
- much-needed housing in a sustainable location (NPPF Paragraph 11(d)(ii) gives this matter particular regard);
 - 50% affordable housing (NPPF Paragraph 11(d)(ii) gives this matter particular regard);
 - improved pedestrian including enhanced links to PRoW NS153, which will be of benefit to the wider community;
 - new areas of open space and green corridors which are publicly accessible;
 - economic benefits associated with the construction and operational phases of the development;
 - a Biodiversity Net Gain of at least 10%;
 - proposals which will secure a well-design place that makes effective use of land (NPPF Paragraph 11(d)(ii) gives this matter particular regard); and
 - a development which responds to the requirements of climate change by promoting sustainable master planning principles that create more resilient and adaptable places for the future.
- 7.2.9 Based on this assessment, it is clear that the benefits of the proposals (as listed above) significantly and demonstrably outweigh any perceived harms, it is

therefore considered that Outline Planning Permission should be approved for the submitted Application without delay.

8 SUMMARY AND CONCLUSION

8.1 OVERVIEW

- 8.1.1 An Outline Planning Application has been submitted to GBC for the development of land at west of School Lane, Higham, for residential development of up to 50 no. homes on Grey Belt land.
- 8.1.2 GBC is unable to demonstrate a five-year supply of housing land with its current supply just 3.0 years. As such, the tilted balance is engaged (NPPF Paragraph 11(d)) and the development should only be refused if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.1.3 Nationally there is significant emphasis on the delivery of both market and affordable housing. There is a dire need for both in the Borough which the Council is currently failing to plan for (through the absence of a 5 year housing land supply), with no immediate prospect of this being remedied through the adoption of a new Local Plan.
- 8.1.4 Gravesham is a highly constrained Borough, with limited options of growth. Higham is a suitable and sustainable location for growth, as recognised through the Site's emerging allocation in the draft Local Plan. The development would make a valuable contribution towards market and affordable housing land supply in the Borough. Alongside housing it will also deliver other significant environmental, social and economic benefits.
- 8.1.5 This Application has been prepared following substantial Pre-Application discussions with the Local Planning Authority and through a thorough analysis of the Site's opportunities and constraints.
- 8.1.6 The accompanying assessments demonstrate that the proposals are acceptable, delivering a quantum of high-quality housing that is entirely suitable for the Site and is in keeping with the local area, whilst making the most efficient use of a greenfield site.

8.2 CONCLUSION

- 8.2.1 The proposals substantially comply with the Development Plan. Where the proposals do not fully comply with policies, these are out-of-date where they restrict development coming forward and therefore attract limited weight in the planning balance
- 8.2.2 In weighing up the planning balance, reviewing the submitted information, and assessing the proposal, the public benefits of the proposal entirely outweigh the harm.
- 8.2.3 The Site is suitable and available, and the development achievable and deliverable in order to meet the Council's immediate and significant housing need.

- 8.2.4 For the reasons sets out above, we respectfully request that the Council give this Planning Application favourable consideration and grant Outline Planning Permission without delay.