

Planning Statement

**Kendelrene, Rhododendron Avenue,
Meopham, Kent, DA13 0TT**

Permission in Principle application for the
erection of up to 1 dwelling.



By: GRAHAM SIMPKIN PLANNING

For: Cadguys

Project reference: PR4759

20 August 2026

office@gsplanning.uk



Contents

1	Introduction.....	3
2	Site Context.....	4
3	Relevant History.....	5
4	Proposed Development	6
5	Planning Policy	7
6	Planning Assessment.....	10
7	Conclusions	20

1 Introduction

- 1.1 This Planning Statement has been submitted in support of an application for the following development at Kendelrene, Rhododendron Avenue, Meopham, Kent, DA13 0TT (hereafter referred to as 'the Site'):

Permission in Principle application for the erection of up to 1 dwelling.

- 1.2 The proposed development affects the following Land Registry title(s):

Title Number	Description	Owner
K456676	LAND AND BUILDINGS ON THE EAST SIDE OF RHODODENDRON AVENUE, MEOPHAM, GRAVESEND	The Applicant.

- 1.3 The application is accompanied by the following plans and documents:

- 4579.ON – Planning Statement.
- 4759.ON - A1 - 3317997 - Charlesworth Nursery Appeal Decision
- 4759.ON - A2 - 3354674 -Broadheath Farm Appeal Decision.
- 4759.ON – A3 - TH659197
- KENDELRENE - Rhododendron Ave_SITE LOCATION

2 Site Context

- 2.1 The Site consists of a small, detached chalet that is situated on the east side of Rhododendron Avenue on an extensive parcel of land amongst other detached residential dwellings and occupies a total of approximately 728 m².
- 2.2 The chalet, which has a footprint of 21m², comprises 1 small bedroom, a kitchen and a living room and is approximately 1.5 storeys tall.
- 2.3 Despite being dilapidated, the principal elevation of the dwelling comprises two large windows (that appear to be knocked through), a white front door, and is constructed from a brick material.
- 2.4 Also on the Site is a small domestic outbuilding which is not apparent on the originally approved plans and is constructed from a similar or the same material as the main chalet.
- 2.5 As it exists, the Site is extremely overgrown with bushes and trees dominating the area and the chalet itself.
- 2.6 In a wider context, the Site forms part of a predominantly residential area of Meopham comprising a range of dwellings that vary in size and style, which is evident along Rhododendron Avenue.
- 2.7 This Site is the subject of the following planning constraints and characteristics:
 - Metropolitan Green Belt.
 - Harvel Wooded Down Landscape Character Area.
 - Flood Zone 1.

3 Relevant History

3.1 The following records are understood to be relevant to the Site:

Erection of a weekend and holiday chalet to replace the existing one to be demolished

Ref. No: TH/6/59/197 | Status: Approved with conditions.

Outline application for the erection of detached 3-bedroom replacement dwelling with rooms in basement and roof space.

Ref. No: 20020385 | Status: Refused on the basis it is contrary to Green Belt policy and the open rural qualities of the area.

Prior approval application for a single-storey rear extension with a depth of 8 metres, maximum height of 4 metres and eaves height of 4 metres.

Ref. No: 20250795 | Status: Refused on the basis that the existing structure was not considered to be a dwelling and therefore does not benefit from the associated Permitted Development (PD) Rights.

4 Proposed Development

- 4.1 The application entails the following elements:
- Permission in Principle application for the erection of up to 1 dwelling.
 - Access granted from Rhododendron Avenue.
- 4.2 As a first-stage application for permission in principle, if the outcome is positive, it still does not result in planning permission being granted. This is only the case once a second-stage 'technical details consent' has been obtained. Each stage benefits from a five-week determination period.
- 4.3 This application type was first introduced in 2018 in order to assist with boosting permissions for small-scale housing-led developments (limited to less than 10 dwellings and less than one hectare of land) and separates the fundamental principles of a site (location, land use, and amount of development) from the technical and architectural details, helping applicants to save time and costs.
- 4.4 In terms of plans required, this is limited to a scaled site location plan identifying the land relating to the application. No other plans are required (either via local or national validation requirements) on the basis that this is the only plan that a decision maker will need to make a judgment based on the limited matters under consideration as part of a stage one 'PIP.' This means, for example, that a proposed layout plan is not required to judge whether the amount of development is appropriate. This matter is therefore limited to the density based on the number of proposed dwellings and how that might impact on the character of the area and/or occupants of adjoining land. Clearly, it is for the technical details stage to set out – and provide the ability to refuse – details relating to design, layout and scale, much like how a reserved matters submission is determined following the approval of an outline application with these matters reserved for future consideration. Thus, if there are concerns that the details of proposed housing would, for example, result in harm to heritage assets, a decision maker would be able to express a fully informed view at the second stage of the PIP process.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker, this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 3 of section 1 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6).
- 5.3 Policy S3 of the Framework states that development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
- 5.4 Policy DM3 of the Framework requires local planning authorities (LPAs) to work with applicants in a positive and proactive manner, seeking solutions to problems arising from initial proposals. LPAs should also take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact. LPAs must only consult statutory or internal consultees only where it is necessary to do so and must not delay issuing a decision in order to secure advice from a statutory or internal consultee beyond their statutory deadlines unless insufficient information exists, there are public safety risks from proceeding without advice, or more detailed advice may enable an approval rather than a refusal.
- 5.5 Annex A of the Framework confirms that for the purposes of decision-taking, development plan policies should not be given reduced weight simply because they were adopted prior to the publication of the Framework. It adds that development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight.

Development Plan

- 5.6 It is understood that the Development Plan for Gravesham Borough Council (the LPA), within which the Site is located, comprises the following documents:
- The Gravesham Local Plan Core Strategy (CS) (September 2014);
 - Remaining Saved Policies of the Local Plan First Review (1994) (LPFR); and
 - The Kent Minerals and Waste Local Plan 2013 - 2030 (2016, revised 2020)
- 5.7 In the CS, the following policies are considered most relevant in the assessment of this application:
- CS01 - Sustainable Development Policy
 - CS02 - Scale & Distribution of Development Policy
 - CS11 - Transport Policy
 - CS12 - Green Infrastructure
 - CS19 - Design & Development Principles
- 5.8 In the LPFR, the following policies are considered most relevant in the assessment of this application:
- P3 - Vehicle Parking Standards
 - T1 - Impact of Development on the Highway Network.

Other Material Considerations

The Framework

- 5.9 In summary, the following paragraphs and national decision-making policies are considered most relevant as additional material considerations in connection with the proposed development:
- Paragraph 17 – Achieving sustainable development
 - Policy S3 – Presumption in favour of sustainable development
 - Policy S5 – Principle of development outside settlements (paragraphs 2 and 5)
 - Policy HO7 – Boosting the supply of homes
 - Policy HO13 – Build out of residential and strategic sites
 - Policy L2 – Making effective use of land
 - Policy L3 – Achieving appropriate densities
 - Policy GB7 – Not inappropriate development in the Green Belt
 - Policy TR3 – Locating development in sustainable locations
 - Policy TR6 – Assessing transport impacts
 - Policy N2 – Improving the natural environment

- 5.10 It is noted that the application of all the above paragraphs and policies from the Framework, with the exception of paragraphs 11 and 155, are not dependent on whether an authority has a five-year housing land supply (5YHLS).

6 Planning Assessment

Key Issues

6.1 The following are considered to be the key issues in the assessment of this application:

1. Green Belt.
2. Location.
3. Land Use.
4. Quantum.
5. Planning Balance.

1. Green Belt

6.2 Section 13 of the Framework states that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

6.3 Policy GB6 of the Framework states that when considering any planning application, LPAs should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness.

6.4 Policy GB7 lists categories of development that are not inappropriate in the Green Belt and should be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances. These categories include the following that are relevant to the Applicant's case for the proposed development:

- (c) limited infilling in a village lying within the Green Belt
- (e) previously developed land
- (g) development utilising Grey Belt land

Limited infilling in a village

6.5 In order to understand whether the subject application meets the criteria of paragraph (c) of policy GB7, the exception has been broken down into individual tests.

6.6 At the outset, the proposed development must be considered limited in scale. As this application is a first-stage Permission in Principle submission, which establishes the principle of development for no more than nine dwellings (i.e. not

a major development), the scale of development can reasonably be regarded as limited. In this case, however, the 'up to' number of dwellings is only 1.

- 6.7 Secondly, it is important to establish whether the proposed development can reasonably be considered an infill. By virtue of the location of the Site (between two dwellings and forming part of the linear residential development along Rhododendron Avenue, it is logical to assume that the proposal will assist in infilling part of the gap between Tall Trees and Oakley Dene Lodge.
- 6.8 Concerning the village element of the exception, the Applicant contests that the Site sits close to and operates closely with the village of Vigo rather than an isolated parcel of land.
- 6.9 It is widely accepted that development sites do not necessarily have to be within the village boundary to be considered paragraph (c) of policy GB7 (formerly paragraph 154 (e) and prior to that 149 (e)), which is demonstrated in appeal decision 33179979 (**Appendix 1**).
- 6.10 In paragraph 7 of the aforementioned appeal decision, the Inspector makes clear that, as confirmed by the Wood judgement, the boundary of a village defined in a local plan may not be determinative for the purposes of paragraph 149(e) of the Framework. The Inspector proceeds to state that when considering whether a site is in a village, the decision maker should have regard to the situation on the ground, as well as any relevant policies,
- 6.11 The Inspector continues to state in paragraph 8 that this particular appeal site was "on the edge of the densely built-up development within Charlesworth and lies within its more loosely developed fringes." A short section of field separated the cluster of buildings around the appeal site from the defined village boundary.
- 6.12 In the context of the Site, it appears to follow a similar pattern by way of being situated on the edge of a built-up area of Vigo Village, yet falling outside of the village boundary.
- 6.13 Subsequently, based on the 'situation on the ground', it would be logical to assume that the Site forms part of the village of Vigo by virtue of its proximity.
- 6.14 Therefore, the Applicant considers the proposed development to meet the criteria of policy GB7 (c), and therefore should be considered to be appropriate development in the Green Belt.

Previously Developed Land (PDL)

- 6.15 Policy GB7 (e) of the Framework sets out an exception to development in the Green Belt, which reads as follows:

Limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use, including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

- 6.16 PDL is defined as “land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure, such as large areas of hardstanding which have been lawfully developed.”
- 6.17 The first test to establish that the Site is PDL is that it has been lawfully developed. As per decision TH/6/59/197 (**Appendix 3**), it is confirmed that the existing structure at the Site has been erected lawfully, and therefore passes the first test to be considered PDL.
- 6.18 The second test requires the Site to be occupied or previously occupied by a permanent structure and any fixed surface infrastructure associated with it. The approved holiday home continues to exist at the Site.
- 6.19 The final test relates to the remaining curtilage of the building. The definition of PDL states that this can include the curtilage. The Site was historically and lawfully used as a holiday home (as with most of Rhododendron Avenue post WW2), and is also considered to be related to the surrounding garden area. It is therefore claimed that, since neither element would operate in isolation, but rather in connection with one another, the Site forms part of the curtilage of the developed land.
- 6.20 Whilst the proposed development would introduce additional built form, policy GB7 (e) does not prohibit built form. The relevant test is whether the proposal would give rise to a substantial impact on the openness of the Green Belt, having regard to both spatial and visual considerations.
- 6.21 At the technical details stage, there would be scope to limit the scale, height and siting of any additional development, for example, through a compact single-storey dwelling, resulting in a modest infill between built form that already lines the street scene. With appropriate control over footprint, layout and volume, it would be possible to avoid a substantial impact on openness. On this basis, it is

reasonably foreseeable that a scheme could accord with policy GB7 (e) of the Framework.

- 6.22 Overall, based on the evidence provided, the subject Site is considered to be PDL. Therefore, it is quite possible that, as part of the second detailed stage, the proposal will not prove to be inappropriate development in the Green Belt, benefiting from the exception under GB7 (e) of the Framework.

Grey Belt

- 6.23 The Applicant also considers that the proposed development is an exception under paragraph (g) of policy GB7 of the Framework, which sets out that developments in the Green Belt should not be regarded as inappropriate, subject to compliance with all criteria.

a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

- 6.24 In the Framework, Grey Belt is defined in the glossary at Annex B as land in the Green Belt comprising Previously Developed Land (PDL) and/or any other land that, in either case, does not strongly contribute to any of the purposes (a), (b), or (d) in policy GB2. The Applicant contests that the Site is PDL (as above), but if this is not accepted by the LPA, the following is an assessment against the remaining Grey Belt definition, reflective of Annex E of the Framework (Green Belt Assessments).
- 6.25 The erection of 1 dwelling will not contribute to the unrestricted sprawl of large built-up areas because: (i) it is not adjacent to a large built-up area (only Vigo and Culverstone Green, but these are villages, and the NPPG advises that villages should not be considered large built-up areas); (ii) the proposal is modest in scale, constituting a 'minor' development; (iii) it is contained within the existing Site boundaries, and is not considered to extend beyond this; (iv) the subject Green Belt is the Metropolitan Green Belt, which is part of the outer edge of Green Belt surrounding London. In this context, London is the most relevant large built-up area, and consequently, the Site does not contribute strongly to purpose (a).
- 6.26 The definition of purpose (b) refers to the need 'to prevent neighbouring towns merging into one another.' As stated above, only villages exist nearby, so it cannot be said that the Site contributes to this purpose.

6.27 The definition of purpose (d) refers to the need 'to preserve the setting and special character of historic towns.' Again, given that only villages exist nearby and no heritage harm is likely to be identified, it is not expected that GBC will identify a conflict with this purpose.

6.28 The above demonstrates that the Site meets the requirements of criterion (g)(i) of policy GB7.

b) There is an evidenced unmet need for the type of development proposed.

6.29 Footnote 41, which concerns criterion (g)(ii), explicitly states that in the case of applications involving the provision of housing, a demonstrable unmet need means the lack of a five-year supply of deliverable housing sites (5YHLS) or where the Housing Delivery Tests were below 75% of the housing requirement over the previous three years.

6.30 As per the 5YHLS Statement published by the LPA in July 2026, the LPA confirms that currently it can only demonstrate a land supply for 2.53 years, rather than the required 5, as well as a three-year delivery rate of 61% (below the required 75%).

6.31 The lack of housing land supply and delivery is considered to be sufficient evidence to demonstrate an unmet need for the type of development which is proposed at the Site, adhering to criterion (g)(ii) of policy GB7.

c) The development would be in a sustainable location, with particular reference to policy TR3 of this Framework

6.32 Part (a) of paragraph 1 of policy TR3 of the Framework states that development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are, or can be made, sustainable. For an indication of what is meant by "significant amounts of movement", the Applicant refers to policy TR6. This says in such circumstances a transport statement or assessment should accompany such an application. In addition, the NPPG states that: "whether locations are sustainable should be determined in light of local context and site or development-specific considerations."

6.33 The LPA's local validation list (including the latest draft version) refers to page 9 of Kent County Council's Supplementary Planning Guidance 4 for details of the thresholds for submitting a transport assessment. This confirms that the threshold is 100 dwellings. The LPA's local validation list further advises that "for

smaller schemes expected to generate relatively low numbers of trips, a transport statement will be sufficient." As this must be referring to housing developments of less than 100 dwellings, it is reasonable to infer that the LPA considers that developments of less than 100 dwellings "generate low numbers of trips" but crucially certainly not (in applying the wording of policy TR3) "significant amounts of movements".

6.34 In response to this and other factors the following can therefore be concluded:

1. The scale of the proposed development is for 99 dwellings less than the threshold for a transport assessment as per local validation requirements
2. It is also 9 dwellings short of the definition of a "medium development" as defined in Annex B of the Framework
3. It does not meet the threshold of a "major development" as defined in Annex B of the Framework due to the development being for less than 10 dwellings
4. It does not attract any affordable housing contributions as is often the case with development that could "generate significant amount of movement"
5. Being for far less than even 10 dwellings it will not significantly contribute to infrastructure stress, and does not trigger any requirement for financial contributions towards matters such as education, social care, libraries and other County Council services
6. It does not require an environmental impact assessment as it is unlikely to have significant effects on the environment
7. In the alternative case of a fully detailed planning application, it would not be of a significant scale to warrant the submission of an agent of change assessment, community facilities assessment, construction management plan, construction logistics plan and delivery and servicing plan, daylight/sunlight assessment, health impact assessment, landscape/townscape visual impact assessment, landscaping scheme, planning obligation, safety, security and resilience to emergency strategy, statement of community involvement, utilities assessment, water, sewerage and surface water drainage assessment, recycling and waste management strategy, all being required under this LPA's local validation list for developments proposing 10 or more dwellings.

6.35 It is therefore said that this is for a small development and a proportionate conclusion to reach is that small developments do not generate "significant amounts of movement", with there being evidently no requirement that the scale of this development warrants a transport statement or transport assessment.

6.36 The consequence of the above is that the first part of policy TR3 in the Framework does not apply as a development that will not "generate a significant amount of

movement." It follows that there is no Framework requirement for this development proposal to be within a location that is sustainable.

- 6.37 For the record, TRICS data confirms that 0.5 trips are generated by a single dwelling during the AM peak hour, meaning that 1.5 additional trips are likely in this case. Such additional traffic will not be detectable when compared to the existing context.
- 6.38 Despite the above, the Site is 300 m due north of a bus stop known as Timber Bank (in both directions), which is served by various buses including the 306, 308, 418, 418R and V1.
- 6.39 The 306 service operates from Vigo Village to Gravesend twice a day Monday through Friday, with the bus departing the stop at 08:14 and 15:35. The bus calls at notable stops on the route such as Meopham Secondary School, Meopham Station and Bat and Ball Railway Station.
- 6.40 Meopham Station provides rail links to London Victoria, with the first train departing at 05:20 and subsequently running at 05 and 35 past the hour until 00:13 (Monday to Friday). On a Saturday, the first service departs 05:20 and runs every 16 and 35 past until 23:47. Finally, on a Sunday, the first service departs at 07:06 and subsequently runs every 30 minutes until 23:37.
- 6.41 The Bat and Ball Railway Station also provides links to London via Victoria, Blackfriars, Charing Cross and Cannon Street. The first train on Monday through Saturday departs at 05:25 and runs every 25 to 30 minutes until 00:51. The Sunday service departs at 07:31 and runs every 15 minutes until 00:51.
- 6.42 The 308 service runs between Sevenoaks and Bluewater from Timber Bank, with the first service departing towards Sevenoaks in the week at 07:32, 09:50, 11:20, 12:50 and 14:40. The return service runs towards Bluewater at 09:57, 11:22, 12:52, 14:42, 16:26, 17:24 and 18:24. The service also runs on a Saturday towards Bluewater at 09:52, 11:22, 13:22, 14:52, 16:22 and 18:22.
- 6.43 Timber Bank is also served by the 418 and 418R, both of which are school services, so only operate in the week. The 418 departs towards the Wrotham Schools at 07:56 and returns at 15:19, whilst the 418R departs at 07:59 and returns at 15:19. The V1 is also a school services that run between Vigo and Denton. The service departs Timber Bank at 07:21 and returns at 14:38.

- 6.44 Should the LPA consider the bus and train-related services insufficient in isolation, it is noted that the Site lies within 450 m of the village of Vigo, which comprises various amenities.
- 6.45 Such amenities include a pet groomer (366 m), Vigo Village School (427 m), Vigo Grill (463 m), a public house (512 m) and a pet shop (562 m), all of which are within a 10-minute walk from the Site.
- 6.46 It is reasonable to mention that not all settlements are ever likely to have a full range of services and facilities, so existing and future residents would need to leave any settlement to access certain services and facilities, such as secondary schools, medical facilities, and places of employment. Adding to the local population will help support rural businesses and can only be said to potentially increase usage of rural bus services, in compliance with paragraph 1(b) of policy TR3.
- 6.47 In addition, the NPPG states that: "whether locations are sustainable should be determined in light of local context and site or development-specific considerations."
- 6.48 TRICS data confirms that 0.5 trips are generated by a single dwelling during the AM peak hour, meaning that 0.5 additional trips are likely in this case. Such additional traffic will not be detectable when compared to the existing context.
- 6.49 Additionally, a recent 'grey belt' housing appeal decision concluded that the relevant settlement had limited services and facilities and that journeys to other facilities and services were likely to be made by car but would be brief and, given the scale of development, limited (see paragraphs 10-13 in particular of appeal decision 3354674, attached as **Appendix 2**). The Applicant considers that the same can be said here.
- 6.50 Given the above site-specific considerations, as well as the local context (a rural predominantly residential location), coupled with the less than major extent of development proposed (and thus the likelihood of brief and limited additional trips by car) and the ability to access nearby identified amenities and settlements by bicycle and by foot, the Applicant considers that the location is a sustainable one for the development proposed that complies with paragraph (g)(iii) of policy GB7.
- 6.51 Overall, the grey belt exception to development in the Green Belt, as set out in paragraph (g) of policy GB7 of the Framework, applies.

2. Location

- 6.52 The location of the Site and its sustainability have been explored in detail in part 1 of this assessment under 'Green Belt', and it is considered to have been established that the Site is in a suitable location for housing.

3. Land use

- 6.53 The Site is bordered by a dwelling known as 'Tall Trees' to the north and multiple dwellings to the south, known as Oakley Dene Lodge, Garwood and Grangewood Cottage.
- 6.54 Due east of the Site is Silver Birch Farm, whilst due west is Rhododendron Avenue, which separates the Site from further dwellings such as Valley Lodge and Markland.
- 6.55 The proposed land use is entirely appropriate.

4. Quantum

- 6.56 The maximum number of proposed dwellings at the Site (1) is considered to be appropriate and relative to the size and shape of the application Site. The dwelling will clearly be able to benefit from adequate space for landscaping, parking, access and amenity space.
- 6.57 The number of dwellings proposed reflects a modest and proportionate level of development that avoids over-intensification. The proposed density, at up to 13 dwellings per hectare, is considered to align with the established character of the area.
- 6.58 This is considered to be in accordance with policy CS19 of the CS, which states that all new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated.

5. Planning balance

- 6.59 As noted above, it is understood that the LPA cannot presently demonstrate an up-to-date 5YHLS when measured against its objectively assessed need. Furthermore, the LPA's most recent Housing Delivery Test is less than 75%. Whether a forthcoming action plan exists or whether the LPA will, in the near future, have a 5YHLS or deliver a sufficient number of homes, does not matter,

when considering the weight to give to the benefit of providing homes at this moment in time.

- 6.60 The extent of the 5YHLS shortfall is significant at almost half what it should be (2.53 years, as confirmed in July 2026). The extent of the shortfall in recent housing delivery, as confirmed as part of the Housing Delivery Test results published on 17th August 2026, is equally poor at just 61%.
- 6.61 As such, evidence of unmet housing land supply and delivery should be given substantial weight in the determination of this application, as required by policy HO7 of the Framework.
- 6.62 The Applicant considers that the following are clear benefits of the proposal:
- It will make a positive contribution to the Council's housing needs that warrants substantial weight as per policy HO7 of the Framework;
 - As a small housing site, it could be delivered quickly;
 - The provision of housing would bring economic benefits in the short term, through employment and investment related to construction activity, and in the longer term, through the spending power of residents that would benefit local shops and businesses;
 - It would result in a better use of land that is otherwise likely to remain vacant for the foreseeable future.
- 6.63 The Applicant considers that the development is appropriate development in the Green Belt and that there are no adverse effects of allowing the proposal and certainly not to the extent that these would substantially outweigh the benefits when assessed against the national decision-making policies in the Framework, as required by policy S5 (NOTE: no reference is made in this national policy to an assessment against any development plan policies).

7 Conclusions

- 7.1 Overall, it is considered that the proposal is an appropriate development in the Green Belt as it complies with at least one of the exceptions as set out in the Framework.
- 7.2 The scale of the proposed development means that it will not “generate a significant amount of movement” to the extent that a transport assessment or statement is required by policy TR6 of the Framework and thus it is not required to be within a sustainable location as required by policy TR3. In any case, the Site is considered to be situated within a sustainable location given its rural context, being served by various local amenities and transport links to Gravesend and beyond into London and the Medway towns.
- 7.3 Concerning the land use, the additional dwellings will be closely situated to nearby dwellings along Rhododendron Avenue (on both sides), as well as the dwellings on the boundary of Vigo Village.
- 7.4 Lastly, the quantum of the proposal is considered to be in keeping with the size of the Site as well as the density of nearby residential developments. It will not result in an over-intensification or over-development of the Site.
- 7.5 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority, and it is respectfully requested that this submission be approved.