

PLANNING STATEMENT

Woodlands Farm, Wrotham Road, Meopham, Culverstone, Gravesend, Kent, DA13 0RQ

Outline planning application for the development of 67 dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Newlands Lane, with all other matters reserved.

LOCAL PLANNING AUTHORITY- Gravesham Borough Council

PRE-APPLICATION REFERENCE- PRE20250148

KCC HIGHWAYS PRE-APPLICATION REFERENCE- PAP/2025/172

PREPARED BY- Dream Design Develop Ltd

DATE- August 2026



01474 648009

info@dreamdesigndevelop.co.uk

www.dreamdesigndevelop.co.uk

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Document Control

Item	Details
Document	Planning Statement
Application	Outline planning application for the development of 67 dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Newlands Lane, with all other matters reserved.
Site	Woodlands Farm, Wrotham Road, Meopham, Culverstone, Gravesend, Kent DA13 0RQ
Planning Authority	Gravesham Borough Council
Pre-application reference	PRE20250148
Status	Planning application issue - Statement in support
Date	August 2026
Prepared by	Dream Design Develop

This Planning Statement assesses the current application description and the 67-dwelling illustrative framework. Read with the supporting technical evidence, it demonstrates capacity for a landscape-led development and identifies clear routes for securing suitable access, green infrastructure and environmental safeguards. Matters requiring confirmatory assessment or authority approval are identified transparently and can be addressed without altering the fixed development quantum.

Supporting application evidence

Document	Author
Illustrative Proposed Site Plan / Block Plan - reserved matters not for approval	Dream Design Develop Ltd
Illustrative Proposed Landscaping Plan - reserved matters not for approval	Dream Design Develop Ltd
Trees / Hedges to be Removed Plan	Dream Design Develop Ltd
Transport Statement	Roads & Sewers for Planning & Design Ltd
Walking & Cycling Audit	Roads & Sewers for Planning & Design Ltd
Flood Risk Assessment, Drainage & SuDS Strategy	Roads & Sewers for Planning & Design Ltd
Preliminary Ecological Appraisal	PJC Consultancy Ltd
Bat Emergence Survey Report	PJC Consultancy Ltd
Reptile Survey Report	PJC Consultancy Ltd
Biodiversity Net Gain Feasibility Assessment	PJC Consultancy Ltd
Statutory Biodiversity Metric	PJC Consultancy Ltd
Arboricultural Impact Assessment / Preliminary AMS / Tree Protection Plan	PJC Consultancy Ltd
Archaeology Desk-Based Assessment & Heritage Statement	AB Heritage Ltd
Geophysical Survey (Magnetometer)	Kevin Cornwell
Highways Pre-Application Response	Kent County Council Highways & Transportation
Gravesham Pre-Application Response	Gravesham Borough Council

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1 Executive Summary

Outline planning application for the development of 67 dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Newlands Lane, with all other matters reserved. The block plan demonstrates capacity and a coherent design framework; it does not seek detailed approval of individual dwelling designs or the reserved matters.

The proposal is the product of extensive pre-application engagement and positive scheme evolution. The current 67-dwelling framework materially reduces the earlier quantum and is organised around meaningful open space, a play area, multiple SuDS features, a reinforced landscape structure, 230 new trees, substantial illustrative parking and a greatly expanded technical evidence base. The result is a lower-density, landscape-led framework capable of forming a high-quality neighbourhood that responds positively to the site and its rural-edge context.

The primary planning case is clear: the proposal satisfies NPPF paragraph 155 and should not be regarded as inappropriate development in the Green Belt. The pre-application officer response concluded that the site can be described as grey belt, recognised demonstrable unmet housing need and identified the potential for the location to be sustainable subject to further work. The current application materially advances the scheme-specific evidence supporting that case, while the final judgement remains for the Local Planning Authority.

Housing need is acute rather than marginal. The Council's July 2026 Five-Year Land Supply Statement identifies an annual local housing need of 676 dwellings, a five-year requirement of 3,380 dwellings, a 20% buffer giving a requirement of 4,056 dwellings, and only 2,053 deliverable homes. The resulting shortfall is 2,003 dwellings and the Council records only 2.53 years of supply. The Housing Delivery Test result remains 59%. These circumstances meet the national policy definition of demonstrable unmet need for housing and engage paragraph 11(d).

The sustainability evidence has also advanced. The Transport Statement assesses a revised principal access from Newlands Lane developed following KCC's comments on the pre-application concept. It considers measured traffic speeds, visibility splays, vehicle tracking, collision data, parking and trip generation. It predicts approximately 50 two-way movements in the AM peak and 59 in the PM peak and concludes, as the applicant's highway evidence, that the network effect is unlikely to be noticeable. The Walking & Cycling Audit identifies bus stops approximately 75m and 120m from the site, local bus services, facilities within walking/cycling range and a proposed 2.5m country footpath. The access and any off-site measures remain subject to KCC's consideration and the necessary highway approvals.

The landscape and ecological strategy is a central component of the development. The updated landscape plan incorporates 230 new trees, species-rich native hedgerow, mixed native scrub, retained boundary vegetation, open grassland, SuDS and a play area. The arboricultural assessment identifies no Tree Preservation Orders, no ancient or veteran trees and no ancient woodland within or adjacent to the site, and concludes that tree-related amenity effects would be minor subject to protection and replacement planting.

The biodiversity strategy combines on-site habitat retention, creation and enhancement with a defined statutory off-site delivery route. It provides a 28.65% on-site hedgerow-unit gain, including approximately 0.2km of new species-rich native hedgerow. The updated assessment quantifies the remaining requirement as 10.10 off-site habitat units, equivalent to 20.20 Tier A1 credits. Subject to securing and recording the required allocation from a registered gain site and approval of the Biodiversity Gain Plan, this combined approach provides a clear route to achieving the statutory 10% objective for at least 30 years.

The site is in Flood Zone 1. The FRA identifies no material flood risk from the principal sources assessed and proposes an open-SuDS-led surface-water concept using swales, attenuation basins and infiltration where suitable. BRE365/borehole testing, groundwater information, land-quality evidence and a complete water-quality assessment will determine the final drainage hierarchy. Any deep-bore infiltration would be used only where technically justified and agreed with the relevant risk-management authorities. Foul drainage is proposed to connect to the public sewer via a pumping station, subject to the sewerage undertaker's approval.

Built heritage does not constrain the proposal: the submitted Heritage Statement concludes that Woodlands Farm is not a heritage asset and that nearby heritage assets would not be harmed. Magnetometry covered approximately 1.8 hectares of accessible land and did not identify a concentration of anomalies clearly indicative of a major archaeological site. It recorded a shallow linear feature, a possible infilled pit and responses interpreted as modern or geological. KCC Archaeology can determine whether targeted trial trenching, a Written Scheme of Investigation or other proportionate work is required for the surveyed and inaccessible areas.

Overall planning conclusion The proposal has a compelling policy case for approval: the pre-application officer response concluded that the site can be described as grey belt; Gravesham has only 2.53 years of housing supply; the scheme provides 67 homes and a 50% affordable-housing contribution; the applicant's

transport evidence supports the revised access and sustainable-movement case subject to KCC assessment; and the landscape-led framework provides public green space, SuDS, 230 new trees and a defined statutory BNG route. Paragraphs 11(d), 155 and 158 provide strong support for permission.

2 Introduction and Scope of the Application

2.1 Purpose of the statement

This Statement explains the planning merits of the development, addresses the statutory development plan and material considerations, responds to the pre-application advice, and draws together the technical evidence submitted in support. It is intended to assist the Local Planning Authority in determining the outline application in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.

This Statement draws together the specialist findings and explains how the proposal responds positively to each material planning consideration. It distinguishes evidence relevant to the principle and access sought for approval from details properly secured through reserved matters, planning conditions, the Section 106 agreement, the statutory Biodiversity Gain Plan and separate highway approvals. Principle-critical confirmatory evidence will support determination rather than being deferred indiscriminately.

2.2 Outline application and reserved matters

The application is in outline. The only matter for which approval is sought now is the principal means of vehicular access from Newlands Lane. The reserved matters are appearance, landscaping, layout and scale. The application should therefore be assessed on whether the principle of 67 dwellings is acceptable and whether a suitable principal access can be achieved, while recognising that detailed design controls remain available at reserved matters stage.

The illustrative block plan is nevertheless important evidence. It demonstrates that the stated development quantum can be accommodated alongside a connected street network, appropriate parking, public open space, play provision, SuDS, retained vegetation and substantial new planting. It is not intended to fix every plot relationship or detailed engineering solution where those matters are reserved.

2.3 Scheme evolution and current proposal

The present application is clearly and consistently defined as 67 dwellings. The current application description and latest drawings govern the proposal, while the specialist evidence assembled during the design process informs the reduced scheme. The lower quantum, stronger landscape framework and additional open space reduce the effects assessed during the earlier design stages and reinforce the planning case.

3 Site and Surroundings

3.1 Location and existing use

The site is Woodlands Farm on the southern edge of Culverstone Green, immediately east of Gravesend/Wrotham Road and south of Newlands Lane. The BNG assessment records an approximate site area of 3.4 hectares and an OS central grid reference of TQ 63474 62203.

The western part of the site contains the existing dwelling, stables, a sand school and garden/curtilage areas. The eastern part is predominantly grassland used for horse grazing, enclosed and subdivided by trees, hedgerows and scrub. Existing access is located toward the north-west of the site. The surrounding context is mixed: rural fields and woodland interspersed with residential development, including Culverstone Green to the east/north-east and dispersed properties around Wrotham Road and Hodsoll Street.

3.2 Physical and environmental characteristics

Topographical survey information reported in the FRA shows ground levels of approximately 184.20m AOD toward the front/northern part of the site, rising through approximately 186.50m AOD and to around 189.30m AOD toward the southern side. This topography has informed the drainage concept and will inform detailed finished levels at reserved matters.

- The site lies within the Metropolitan Green Belt.

- The site lies within the Meopham Downs Landscape Character Area and contributes to the rural edge/setting of Culverstone Green.
- The site is not within a conservation area and the arboricultural assessment reports no TPO-protected trees on the site.
- The site lies within an Area of Archaeological Potential / Archaeological Notification Area.
- The site lies within Groundwater Source Protection Zone 3, requiring the final infiltration and water-quality design to be supported by groundwater, land-quality and pollution-risk evidence and agreed with the relevant authorities.
- The site is in established equestrian and horse-grazing use. A site-specific Agricultural Land Classification assessment will confirm the grade and extent of any best and most versatile agricultural land. Any identified effect will be weighed against the contained approximately 3.4ha site area, acute housing need, delivery of 67 homes, the 50% affordable-housing contribution and the proposal's wider public benefits.
- The site lies entirely within Flood Zone 1 according to the submitted FRA.
- No irreplaceable habitats were recorded by the BNG assessment.

3.3 Landscape and settlement edge context

The site is a visually contained rural-edge parcel, influenced by established boundary vegetation, existing development and the surrounding road network. The landscape-led framework retains and reinforces those containing features through broad open-space wedges, SuDS, retained vegetation and extensive new planting. A proportionate Landscape and Visual Impact Assessment will test the effects and confirm the detailed mitigation, while the framework provides a strong basis for an attractive and well-integrated settlement edge.

The site is outside the Kent Downs National Landscape. Its wider setting has nevertheless informed the reduced quantum, generous green infrastructure and reinforced countryside edge. These measures provide a robust basis for an acceptable landscape relationship. The Landscape and Visual Impact Assessment will formally assess the relationship with the protected landscape and confirm that any effect on its setting and special qualities is appropriately avoided or mitigated.

4 Planning History and Pre-Application Engagement

4.1 Relevant planning history

The Council's pre-application response identifies application 20210801, a certificate application concerning the lawful status of extensions, which was refused on 3 September 2021. That decision concerned the evidential basis for existing works and does not determine the acceptability of the present outline residential proposal. No extant permission or planning-history matter has been identified that prevents the current application, which should be determined on its own merits under the current policy framework.

4.2 Gravesham pre-application advice PRE20250148

The pre-application officer response recognised that residential development has the potential to comply with NPPF paragraph 155 and not be inappropriate in the Green Belt, subject to the supporting evidence and detailed assessment. The current scheme has translated that opportunity into a materially improved proposal through the following measures:

- A full paragraph 155 assessment demonstrating the grey-belt route and the site's sustainable location.
- A firm commitment to a 50% affordable-housing contribution in accordance with the Golden Rules.
- A materially reduced, landscape-led framework with generous public open space and a strong countryside-edge treatment.
- A balanced 67-home capacity, lower gross density and substantially reduced tandem parking.
- A consultant-assessed Newlands Lane access supported by measured speeds, visibility calculations, collision review and tracking, with detailed approval remaining subject to KCC consideration and the highway process.
- A substantial ecology evidence base and statutory metric, to be consolidated through a coordinated EclA/ecology addendum, together with a defined on-site/off-site route to 10% BNG subject to securing the required off-site allocation.
- A Flood Zone 1 location supported by an open-SuDS-led surface-water concept, with final infiltration, groundwater, land-quality and water-quality evidence to confirm the detailed solution.
- Completed built-heritage assessment, archaeological DBA and magnetometer survey, with any further targeted evaluation or mitigation to be agreed with KCC Archaeology.
- A clear environmental-protection route comprising a Phase 1 land-contamination assessment and proportionate noise/air-quality screening, followed by any necessary detailed mitigation and enforceable planning controls.
- A landscape strategy comprising 230 new trees, native hedgerow, scrub, open space and integrated SuDS.
- A contained agricultural-land consideration to be confirmed through a site-specific classification assessment and weighed against acute housing need and the proposal's wider benefits.

- Integrated play and public open space, with a quantified schedule, standards assessment and proportionate package of planning obligations to secure delivery and management.

4.3 KCC highways pre-application engagement and design response

KCC's pre-application comments have informed the evolution of the access strategy. The revised scheme avoids the A227 crossroads-style arrangement identified at the pre-application stage and instead proposes a principal vehicular access from Newlands Lane. The Transport Statement assesses this arrangement using ATC-measured traffic speeds, visibility calculations, a five-year collision review and refuse-vehicle tracking. It concludes that the access can operate safely and that no objection should be raised on transport, highway or access grounds. That conclusion is the applicant's highway case; the detailed arrangement remains subject to KCC's consideration, a Stage 1 Road Safety Audit and Designer Response where required, and the necessary highway approvals.

This is an important distinction from the earlier pre-application concept. The current application should be assessed against the submitted 67-dwelling access scheme and Transport Statement, while taking proper account of KCC's earlier concerns and the authority's assessment of the revised evidence.

5 Development Proposal and Illustrative Framework

5.1 Development description

Application description

Outline planning application for the development of 67 dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Newlands Lane, with all other matters reserved.

5.2 Housing quantum and illustrative mix

The block plan illustrates 67 dwellings. Based on the submitted house-type key, the indicative mix is as follows:

Dwelling size	Number	Indicative floor area / occupancy notation
2-bedroom	26	79.5 sq m (2B4P)
3-bedroom	36	95.5 sq m (3B5P)
4-bedroom	5	127 sq m (4B8P)
Total	67	-

Using the approximately 3.4ha site area recorded in the ecological evidence, the gross illustrative density is approximately 19.7 dwellings per hectare. This reflects the substantial land devoted to public open space, SuDS, landscape buffers and retained vegetation. The context-responsive density is a positive design response to the rural edge and demonstrates efficient use of land without sacrificing landscape quality. A net density can be confirmed at reserved matters once the detailed layout is fixed.

The house type areas shown on the illustrative block plan have been developed with national space standards in mind. Final compliance with the Nationally Described Space Standard, private amenity guidance, accessibility requirements and detailed room dimensions will be demonstrated at reserved matters stage.

5.3 Movement, parking and streets

- Principal vehicular access from Newlands Lane, with the access matter sought for approval now.
- Illustrative 5.5m entrance/spine roads and 4.8m secondary streets.
- 2m pedestrian footways on one or both sides of internal roads as appropriate.
- 131 car parking spaces in total: 113 allocated spaces and 18 unallocated visitor spaces.
- EV charging provision for dwellings with on-plot parking and secure cycle storage within sheds/appropriate stores.
- Large refuse vehicle tracking undertaken using an 11.4m vehicle.
- Final turning geometry, fire access and detailed street design to be secured at reserved matters.

5.4 Open space, landscape and SuDS

The indicative framework integrates a substantial green infrastructure network rather than treating landscaping as residual space. It includes a defined play area, broad green edges, multiple SuDS basins, swales, retained trees/hedges and extensive

replacement/new planting. This responds directly to the pre-application criticism that the earlier concept lacked meaningful open space and was hard-landscape dominant.

The detailed planting strategy identifies 230 new trees comprising English oak, field maple, hornbeam, wild cherry, crab apple, whitebeam, small-leaved lime, silver birch, rowan and goat willow, alongside species-rich native hedgerow and mixed native scrub belts.

5.5 Outline-stage capacity and delivery strengths

- Capacity is demonstrated for exactly 67 homes at a context-responsive gross density of approximately 19.7 dwellings per hectare, with a family-housing mix and a firm 50% affordable-housing contribution to be secured through the Section 106 agreement.
- The principal access has been assessed by the Transport Statement and peak traffic equates to less than one additional movement per minute. The illustrative plan provides 131 parking spaces. The applicable KCC locational category and final parking/cycle requirements will be agreed through the planning and reserved-matters process; no reliance is placed on a fixed surplus until that category is confirmed.
- A defined play area, meaningful and well-distributed public open space, SuDS, retained vegetation, 230 new trees, species-rich native hedgerow and mixed native scrub establish a strong and attractive rural settlement edge. The final quantum and standards compliance will be confirmed through the open-space schedule.
- Flood Zone 1 status, an open-SuDS-led drainage concept, the ecology evidence, a statutory BNG route, no identified built-heritage harm and the completed archaeological evidence demonstrate clear pathways to satisfactory resolution, subject to the confirmatory assessments and authority approvals identified in this Statement.
- The outline form preserves appropriate flexibility: appearance, landscaping, layout and scale can be refined at reserved matters without altering the fixed 67-dwelling quantum. The principal access is the only detailed matter sought for approval and remains subject to the Local Planning Authority's determination following consultation with KCC.

Taken together, these elements demonstrate a credible route to a high-quality and landscape-led development. Figures 1 and 2 provide clear capacity and landscape evidence in support of the outline application, subject to the reserved matters and confirmatory evidence identified in this Statement.

Figure 1 - Illustrative Proposed Block Plan



67 dwellings, open space, play area, SuDS and internal street hierarchy. Layout/scale/appearance/landscaping remain reserved matters.

Figure 2 - Illustrative Proposed Landscaping Plan



230-tree planting strategy, species-rich native hedgerow, mixed native scrub, open space and SuDS.

6 Planning Policy Framework

6.1 Statutory decision-making framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan is therefore the starting point, but national policy, the housing supply position, the emerging Local Plan, technical evidence and other material considerations must be weighed in the overall planning balance.

6.2 Adopted development plan and guidance

Policy / document	Relevance to proposal
CS01 - Sustainable Development	Overall sustainable development principles.
CS02 - Scale and Distribution of Development	Spatial strategy and housing distribution; relevant but considered in light of the acute housing supply deficit and NPPF paragraph 11(d).
CS07 - Economy, Employment and Skills	Economic and skills benefits associated with development/construction.
CS10 - Physical and Social Infrastructure	Infrastructure needed to support growth and planning obligations.
CS11 - Transport	Safe access, sustainable travel, parking and network impacts.
CS12 - Green Infrastructure	Landscape, biodiversity, ecological networks and nature recovery.
CS13 - Green Space, Sport and Recreation	Open space, play and recreational provision.
CS14 - Housing Type and Size	Appropriate mix of housing.
CS15 - Housing Density	Efficient use of land while responding to context.
CS16 - Affordable Housing	35% rural baseline policy, supplemented for this proposal by the NPPF Golden Rules requirement, resulting in a 50% contribution.
CS18 - Climate Change	Flood risk, sustainable drainage and climate resilience.
CS19 - Design and Development Principles	Design quality, amenity, noise, contamination and place-making.
CS20 - Heritage and Historic Environment	Built heritage and archaeology.
Saved P3 / T1 / T2 / T4 / T5	Parking, highway impact, access and estate layout.
Saved TC7	Archaeology.
Saved LT6	Additional open space in new housing developments.
SPG2 Residential Layout Guidelines (2020)	Privacy, amenity, separation and residential layout.
Design for Gravesham Design Code (2024)	Character, movement, public realm and accessible design.
Kent County Council Vehicle Parking Standards 2024 (effective 6 February 2025)	Current county guidance. The Transport Statement tests the suburban category, but the applicable locational category and final requirement must be agreed with KCC before a surplus is relied upon.
Gravesham Landscape Character Assessment (2009)	Landscape character context.
Kent Minerals and Waste Local Plan 2024-2039 (2025)	Adopted minerals and waste policy, including mineral-resource and infrastructure safeguarding.
Gravesham Local Housing Needs Assessment (2025)	Current evidence for housing size mix, affordable need and accessible/specialist housing.
Gravesham Local Plan 2042 - Regulation 19 Proposed Submission (17 April 2026)	Emerging spatial, rural, housing, green-infrastructure, design and transport policies. The plan is unadopted and unexamined; its relevant objectives are positively addressed by the scheme.

6.3 National Planning Policy Framework

The operative NPPF is the December 2024 Framework as amended in February 2025. Particularly relevant sections concern sustainable development, decision-making, housing supply, healthy and safe communities, sustainable transport, effective use of land, good design, Green Belt, climate/flooding, the natural environment and the historic environment.

The most important national policy provisions for the principle of development are paragraph 11(d), the five Green Belt purposes in paragraph 143, the Green Belt decision-taking provisions in paragraphs 153-159, the grey belt definition in Annex 2, and the sustainable-location considerations in paragraphs 110 and 115.

6.4 Emerging Gravesham Local Plan 2042

The emerging Local Plan 2042 has reached Regulation 19 Proposed Submission consultation but remains unadopted and unexamined. Its policies may attract only proportionate weight under NPPF paragraph 49 and do not displace the adopted development plan, the operative NPPF grey-belt provisions or the current housing land-supply evidence.

The proposal is a windfall grey-belt scheme. National policy expressly provides a route for such development where paragraph 155 is satisfied. The site's contained settlement-edge location, acute housing need, sustainable transport evidence, 50% affordable-housing commitment and landscape-led framework provide strong support notwithstanding the absence of a specific emerging-plan allocation.

6.5 Emerging policy considerations and positive scheme response

Emerging policy	Topic	Positive application response
LP1 / LP7	Spatial strategy and rural areas	The proposal is a sustainable grey-belt windfall at the settlement edge. Acute housing need and the current national policy route provide strong support.
LP8	Green infrastructure and nature recovery	The landscape plan, AIA, ecology surveys, statutory metric, 230-tree strategy and local off-site BNG hierarchy provide a coordinated green-infrastructure response.
LP9-LP11	Climate, water and high-quality design	SuDS, water-quality controls, a landscape-led design framework and reserved-matters control provide a clear route to high-quality, climate-resilient development.
LP12	Housing delivery, mix and affordability	The 50% affordable-housing commitment exceeds the adopted rural baseline, while the family-housing mix, NDSS and accessibility objectives can be refined and secured at reserved matters/S106 stage.
LP15 / LP18-LP21	Heritage, infrastructure, transport and open space	No identified built-heritage harm, proportionate archaeological control, consultant-supported access subject to KCC, public open space and a statutory obligations package support overall compliance.

Although the emerging plan has not been examined, the proposal already anticipates its principal objectives through 50% affordable housing, substantial green infrastructure, accessible public open space, SuDS, biodiversity delivery, sustainable movement and a high-quality reserved-matters design framework.

6.6 Key policy and evidence sources

Source	Date / status	Role in the planning case
National Planning Policy Framework	December 2024, amended 7 February 2025	Operative national policy and the principal basis for the paragraph 11(d), grey-belt and Golden Rules case.
Gravesham Five-Year Land Supply Statement 2025-2030	July 2026	Confirms 2.53 years of supply and a 2,003-dwelling shortfall, attracting substantial positive weight.
Gravesham Local Plan 2042	Regulation 19, 17 April 2026	Emerging and unexamined; relevant objectives are addressed but it carries less weight than operative national policy.
Gravesham Local Housing Needs Assessment	2025	Supports refinement of the housing mix and accessible/specialist-housing provision at reserved matters/S106 stage.
Kent Minerals and Waste Local Plan	2024-2039; adopted 13 March 2025	Confirms the adopted county policy context; the site-specific safeguarding position should be evidenced by an application screening note or map extract.
KCC Vehicle Parking Standards	2024; effective 6 February 2025	The Transport Statement tests the suburban benchmark; the locational category and resulting requirement remain to be agreed with KCC.

7 Principle of Residential Development and Housing Need

7.1 Current five-year housing land supply

The Council's current Five-Year Land Supply Statement 2025-2030 (July 2026) provides the relevant up-to-date evidence. It confirms that the 2014 strategic housing requirement is more than five years old and therefore uses the Government's Standard Method local housing need for land-supply purposes.

Component	Council figure
Annual Local Housing Need	676 dwellings per annum
Five-year local housing need	3,380 dwellings
20% buffer requirement	4,056 dwellings
Deliverable supply 2025-2030	2,053 dwellings
Supply shortfall	2,003 dwellings
Years of supply	2.53 years
Housing Delivery Test	59%

A 2.53-year supply is a substantial deficit. The proposal would deliver 67 additional homes and therefore makes a meaningful contribution to addressing both the absolute shortfall and the continuing delivery failure. The benefit should be given substantial positive weight.

7.2 NPPF paragraph 11(d)

Because the Council cannot demonstrate a five-year supply, the policies most important for determining this housing application are out-of-date for the purposes of paragraph 11(d) and the tilted balance is engaged. The proposal satisfies paragraph 155 and is not inappropriate development in the Green Belt. The Green Belt designation therefore does not provide a strong reason against the development.

That decision-taking sequence is important. Paragraph 155 is itself part of the current Green Belt policy framework. Where all four criteria are met, the proposal is not inappropriate development and no separate Very Special Circumstances case is required. The decision-maker should then assess any distinct landscape, heritage, highway, ecology or amenity effect under the relevant policy and paragraph 11(d), rather than treating the Green Belt location alone as a second and freestanding refusal test.

The correct planning approach is therefore not to treat the adopted settlement strategy as an absolute bar. It must be weighed with the severe land-supply deficit, the national grey-belt policy introduced after the 2014 Core Strategy, the scheme's sustainability evidence and the detailed environmental mitigation.

7.3 Demonstrable unmet need under paragraph 155(b)

NPPF footnote 56 defines demonstrable unmet need for housing by reference to the lack of a five-year supply (including the relevant buffer) or a Housing Delivery Test result below 75%. Gravesham meets both limbs: only 2.53 years of supply and an HDT result of 59%. Criterion 155(b) is therefore plainly satisfied.

8 Green Belt and Grey Belt Assessment

8.1 Primary Green Belt policy route

Paragraph 155 provides the primary and direct policy route for approval. The evidence demonstrates that all four criteria are met and the proposal should not be regarded as inappropriate development. The alternative Very Special Circumstances case in section 23 provides an additional and compelling basis for approval should it be necessary.

8.2 Grey belt definition

Grey belt includes previously developed land and/or other Green Belt land that does not strongly contribute to purposes (a), (b) or (d) of paragraph 143, excluding land where the application of other protected-area/asset policies identified in footnote 7 would provide a strong reason for refusing or restricting development. Notably, countryside-encroachment purpose (c) is not part of the grey-belt definition itself.

The Council's pre-application response expressly concluded that the site can be described as grey belt. It referred to the existing dwelling, private garden, stables, barn, sand school and equestrian/grazing use and concluded that the site does not

strongly contribute to the relevant purposes (a), (b) or (d). That conclusion is an important site-specific planning judgement made by the Local Planning Authority and remains directly relevant to the current reduced scheme.

8.3 Assessment against the five Green Belt purposes

Green Belt purpose	Site contribution / proposal effect	Assessment
(a) Check unrestricted sprawl of large built-up areas	The site adjoins a rural settlement edge rather than the edge of a large built-up area. Development would be contained within the defined site and existing roads/vegetation.	Does not strongly contribute; no strategic sprawl of a large built-up area.
(b) Prevent neighbouring towns merging	The site is not located in a narrow strategic gap between neighbouring towns.	Does not strongly contribute; no town coalescence.
(c) Safeguard countryside from encroachment	The development would produce a contained change at a rural settlement edge. The reduced 67-dwelling quantum, meaningful open space, retained vegetation and reinforced landscape structure limit the effect and provide a strong mitigation framework, to be tested through the LVIA.	A site-level countryside change is acknowledged but is capable of substantial mitigation; purpose (c) is not part of the grey-belt definition and is addressed separately under paragraph 155(a).
(d) Preserve setting/special character of historic towns	The site is remote from the setting of an historic town. The Heritage Statement identifies no relevant built-heritage setting effect.	Does not strongly contribute.
(e) Assist urban regeneration	Development of this site does not prevent continued brownfield regeneration elsewhere and the Council's pre-app records limited/no or equal contribution for CG7.	No material effect; urban regeneration can continue alongside delivery of urgently needed housing here.

8.4 Paragraph 155(a): would development fundamentally undermine the remaining Green Belt?

The Council's Stage 2 Green Belt evidence, including its assessment of a significant purpose (c) contribution and high release harm for the relevant parcel, is acknowledged and given appropriate weight. That plan-making assessment does not by itself determine the site's grey-belt status or the application-specific paragraph 155(a) test: purpose (c) is not part of the grey-belt definition, while paragraph 155(a) asks whether this development would fundamentally undermine the purposes, taken together, of the remaining Green Belt across the plan area. The application therefore addresses both the acknowledged site-level countryside change and the broader plan-area test.

The proposal would not fundamentally undermine the remaining Green Belt for the following reasons:

- The site is approximately 3.4ha and forms a contained, edge-of-settlement parcel rather than a strategic gap between large settlements.
- It does not perform a strong role in checking the sprawl of a large built-up area, preventing town merger or preserving the setting of an historic town.
- Any purpose (c) effect is strictly localised and is substantially moderated by the reduced 67-dwelling quantum, extensive open space and reinforced landscape structure.
- Existing road infrastructure, surrounding development and established vegetation provide recognisable containment. The proposal does not create a precedent of physically joining towns or eroding a strategic settlement gap.
- The extensive retained and proposed landscape structure preserves a strong green edge and limits outward visual influence.
- The proposal delivers public green space, SuDS and habitat creation across significant parts of the site rather than building across the entirety of the parcel.
- The plan-area Green Belt would remain extensive and capable of performing its purposes after this limited development.

The applicant's assessment is that the limited site-level change is contained and capable of comprehensive mitigation and does not equate to fundamentally undermining the Green Belt purposes across Gravesham as a whole. The LVIA and final Green Belt evidence will document that conclusion in the wider context. On this basis, criterion 155(a) is satisfied.

8.5 Paragraph 155(c): sustainable location

The pre-application officer response identified the potential for the site to be considered sustainable, subject to further work. It also referred to local appeal decisions where Inspectors accepted that rural sites can satisfy paragraph 155(c) where they provide a genuine choice of transport modes proportionate to their context, even where some reliance on private vehicles remains.

The present application provides the further work requested: detailed Transport Statement, ATC data, walking/cycling audit, nearby bus services, local-facility assessment and a proposed 2.5m country footpath. The development is not isolated; it sits directly at Culverstone Green's southern edge. The evidence demonstrates accessibility to education, local services and public transport and identifies specific improvements to active travel. Criterion 155(c) is therefore satisfied in the rural-context sense required by the Framework.

This conclusion also reflects the vision-led approach in NPPF paragraphs 110 and 115. Sustainable-location assessment is not a single distance threshold and does not require every journey to be made without a car. It asks whether sustainable modes are prioritised in the site's context, safe and suitable access can be achieved, streets and parking can follow current guidance, and significant network or safety effects can be mitigated to an acceptable degree. For Woodlands Farm, those matters are addressed by the nearby bus services and local-facility audit, the Walking & Cycling Audit and proposed 2.5m country footpath, the assessed Newlands Lane access, the Transport Statement's network findings and reserved-matters controls over streets, parking, cycle storage and EV provision. Delivery and land control for any off-site measure must be secured through the appropriate condition, obligation or highway agreement.

8.6 Paragraphs 156-159: Golden Rules

Golden Rule	Application response
Affordable housing	Commitment to a 50% affordable housing contribution, with precise whole-unit delivery/tenure and any balancing mechanism to be agreed through the Section 106 agreement.
Necessary infrastructure	The applicant will meet necessary and proportionate infrastructure requirements that satisfy the statutory tests, including any justified KCC/GBC/NHS contributions and highway/active-travel measures.
Accessible green space	The illustrative framework provides meaningful, well-distributed public open space, a play area, landscape buffers, SuDS and green links within a short walk of the proposed homes. The final quantum will meet the applicable standards and long-term management will be secured.
Landscape / nature recovery expectations	The green-space strategy is integrated with 230 new trees, species-rich hedgerow, mixed native scrub, ecological enhancements and a statutory BNG delivery route.

NPPF paragraph 157 requires 15 percentage points above the highest existing affordable housing requirement, capped at 50%, until development plan policies are updated. Gravesham's rural CS16 requirement is 35%; the national formula therefore results in a 50% Golden Rules requirement. The application commits to that contribution. A development which complies with the Golden Rules attracts significant weight in favour of permission under paragraph 158.

9 Affordable Housing and Housing Mix

9.1 Affordable housing

Policy CS16 sets a 35% affordable housing requirement for qualifying rural schemes, with a 70% affordable/social rented and 30% intermediate tenure split subject to viability, local needs and mixed-community objectives. For the purposes of the Green Belt Golden Rules, the applicable percentage is increased to 50%.

Because 67 is an odd number, an exact 50% whole-unit split cannot be expressed without a fractional dwelling. The Section 106 agreement should therefore secure a delivery mechanism that achieves the required 50% contribution in policy terms, with the precise number of on-site units, tenure and any necessary balancing mechanism agreed with the Council. This Statement does not prejudice that negotiation.

The pre-application Housing Development comments recorded substantial affordable need and advised dialogue on tenure/size mix, local connection and allocation/cascade mechanisms. Those details are suitable for the Section 106 agreement and should be based on the most up-to-date housing-needs evidence at determination rather than the older pre-application snapshot alone.

9.2 Market and affordable housing mix

The illustrative scheme provides a strong family-housing offer comprising two-, three- and four-bedroom dwellings, responding to the need for a range of homes and increasing housing choice. As layout is reserved, the capacity mix retains flexibility for refinement with GBC at reserved matters and Section 106 stage while preserving the fixed total of 67 dwellings and the 50% affordable-housing contribution.

The framework is capable of incorporating the accessible-housing, Nationally Described Space Standard and custom/self-build objectives identified by emerging Policy LP12. The appropriate detail, rounding, location and delivery mechanism can be secured at reserved matters and through the Section 106 agreement without prejudging an agreed unit count or tenure split.

Adopted Policy CS16 and emerging LP12 use different tenure formulations. The legally secured tenure and size mix should therefore be agreed with GBC Housing using the evidence current at determination. The only fixed commitment stated here is the 50% affordable-housing contribution required by the Golden Rules.

10 Design, Layout, Character and Residential Amenity

10.1 Design approach

The current plan is intentionally illustrative and must be read as capacity evidence rather than an approved layout. It establishes a clear design logic: development is arranged around a legible street hierarchy; homes generally address streets and public spaces; open-space areas are integrated into the movement network; SuDS features are visible landscape components; and boundary vegetation/green buffers provide a transition to the rural edge.

This directly responds to the pre-application concern that the earlier plan was too dense, lacked open space and risked appearing hard-landscape dominant. The reduction to 67 dwellings creates room for a lower gross density, more generous landscaping and a more coherent green structure.

10.2 Character and detailed appearance

Appearance and scale are reserved. The reserved matters application should therefore use the Design for Gravesham Design Code, local rural/suburban character and the landscape context to establish building heights, roof forms, materials, boundary treatments, frontage rhythm and architectural detailing. Sensitive edges should use lower and more recessive forms where necessary to protect neighbour amenity and landscape character.

10.3 Residential amenity

Policy CS19 and the Council's Residential Layout Guidelines seek satisfactory privacy, outlook, daylight/sunlight and private amenity. Because layout is reserved, the detailed application will demonstrate the relevant separation, amenity and design standards, with ample scope within the low-density framework to achieve a high-quality living environment.

The existing neighbouring properties are relatively dispersed around much of the site perimeter and substantial boundary vegetation is retained. The indicative plan also provides broad green separation in several locations. These factors demonstrate that 67 dwellings can be designed without inevitable unacceptable overlooking or domination. Final finished levels, building heights, window positions and boundary treatments will remain subject to reserved matters control.

10.4 Inclusive and safe design

The reserved matters design should incorporate inclusive routes, accessible dwellings in accordance with prevailing policy/building regulations, step-free connections where levels permit, and clear pedestrian priority. Kent Police Designing Out Crime advice should inform natural surveillance, parking visibility, defensible space, lighting, side gates, cycle stores and the relationship between play/open space and surrounding homes.

11 Landscape, Green Infrastructure and Agricultural Land

11.1 Landscape-led strategy

Landscape is not treated as an afterthought. The illustrative framework retains substantial perimeter vegetation, concentrates new planting in communal/strategic areas, provides significant open areas on the western and southern parts of the site, integrates play space and SuDS and creates a stronger green interface to the countryside. This is the correct response to the Meopham Downs Landscape Character Area and the Council's pre-application advice.

11.2 Proposed planting

Tree species	Number
English oak	35
Field maple	35
Hornbeam	30
Wild cherry	25
Crab apple	25
Whitebeam	20
Small-leaved lime	20
Silver birch	15
Rowan	15
Goat willow	10
Total	230

The landscape plan also specifies species-rich native hedgerow and mixed native scrub belts using a diverse native mix including hawthorn, hazel, blackthorn, field maple, dogwood, spindle, wild privet, dog rose, wayfaring tree, honeysuckle and guelder rose. The mix provides landscape structure and ecological value while avoiding reliance on ornamental planting alone.

11.3 Landscape and Visual Impact Assessment

The landscape-led approach has been informed by the Gravesham Landscape Character Assessment, the Meopham Downs context, public routes and the wider setting of the Kent Downs National Landscape. The site is outside the National Landscape and is influenced by roads, development and established vegetation. The landscape plan and arboricultural evidence establish a strong mitigation framework of retained boundaries, generous open space and 230 new trees. A proportionate LVIA will provide the formal landscape and visual assessment, including the protected-landscape setting and public routes, while reserved-matters control will secure the detailed landscape outcome.

11.4 Agricultural land

The site is a contained approximately 3.4ha parcel in established equestrian and horse-grazing use. A site-specific Agricultural Land Classification assessment will confirm its grade and the extent of any best and most versatile land. Any identified loss must then be weighed against the acute borough-wide housing shortfall, delivery of 67 homes, the 50% affordable-housing contribution and the scheme's extensive green infrastructure. Those benefits attract substantial positive weight in that balance.

12 Arboriculture

12.1 Existing tree resource

The Arboricultural Impact Assessment surveyed 62 individual trees, 10 tree groups, seven shrub groups and six hedges. It records eight Category A individual trees, 22 Category B individual trees, 29 Category C individual trees and three Category U individual trees, alongside the surveyed groups/hedges. No surveyed tree was assessed as ancient or veteran, no ancient woodland is within or adjacent to the site, no TPO protects the surveyed trees and the site is not within a conservation area.

12.2 Tree removals and mitigation

The AIA identifies removal of one group and one partial group categorised B, together with 10 individual trees, one group, one partial group, one partial shrub group, two hedges and two partial hedges categorised C. The report considers the removals generally limited in arboricultural value and screened from wider viewpoints, with the exception of H46 at the site entrance.

The key mitigation is extensive replacement planting in communal areas. The AIA concludes that, subject to its tree-protection measures, the proposal represents a minor impact on local amenity from trees and that the new planting will progressively improve age/species diversity and canopy cover.

12.3 Root protection areas, services and detailed controls

- All proposed buildings are shown outside the Root Protection Areas of retained trees.
- No new hardstanding is proposed within retained-tree RPAs.

- Existing concrete within RPAs of T45 and T49 is to be sensitively removed and replaced with soft landscaping.
- The preliminary drainage layout identifies interfaces with the RPAs of T45, T49 and G48. The final drainage design should route infrastructure outside RPAs wherever practicable. Where an interface cannot reasonably be avoided, installation must follow an approved arboricultural method and be incorporated into the Arboricultural Method Statement. On that basis, the drainage and retained-tree requirements are capable of being made compatible.
- All other new services should be routed outside RPAs and anticipated mature crown spreads wherever practicable.
- A detailed Arboricultural Method Statement and Tree Protection Plan can be secured by condition, ensuring effective protection, supervision and monitoring throughout construction.

13 Highways, Access and Movement

13.1 Principal access sought for approval

The application seeks approval for the principal means of vehicular access from Newlands Lane. The Transport Statement describes adaptation of the existing junction arrangement and reprioritisation/widening works intended to serve the 67-home development. The revised approach was developed in response to KCC's comments on the earlier concept; it is supported by the applicant's highway consultant but is not presented as having already received KCC approval.

The access evidence includes Automatic Traffic Counter surveys, visibility calculations, collision data and vehicle tracking. The Transport Statement reports 85th-percentile speeds and derives visibility requirements accordingly. At the Newlands Lane interface, it adopts a 43m visibility standard in both directions, while the Wrotham Road junction assessment identifies approximately 94.0m and 90.7m visibility requirements associated with measured speeds.

13.2 Traffic generation and highway capacity

Peak	Arrivals	Departures	Two-way total
AM peak	10.519	39.396	49.915
PM peak	38.123	21.038	59.161

These levels equate to less than one additional vehicle movement per minute even at the busier PM peak. The Transport Statement concludes that the effect on the wider highway network is unlikely to be noticeable and recommends no highway objection, subject to the proposed access and associated measures.

13.3 Road safety and collision data

The Transport Statement reviewed collision data and identified two recorded accidents within the assessed 250m area, without a recurring pattern or evidence of a junction-specific safety problem. This does not identify an existing accident pattern that would justify refusal. A Stage 1 Road Safety Audit and Designer Response should nevertheless address the revised access in accordance with KCC's pre-application advice, alongside KCC's consideration of detailed design and visibility.

13.4 Parking, EV charging and cycle storage

Parking evidence	Spaces
Illustrative suburban dwelling benchmark (if agreed)	108 spaces
Illustrative suburban visitor benchmark (if agreed)	13.4 spaces at 0.2 per dwelling (normally rounded to 14)
Illustrative suburban total benchmark (if agreed)	121.4 spaces (normally rounded to 122)
Allocated parking proposed	113 spaces
Visitor parking proposed	18 spaces
Total proposed	131 spaces

The Transport Statement tests the illustrative layout against the suburban category of the KCC Vehicle Parking Standards 2024. On that assumption, the normally rounded benchmark is 122 spaces and the 131 spaces shown would exceed it by nine. The adopted standards, however, require the locational category to be discussed with the planning and highway authorities; written agreement to the suburban category is not evidenced in the submitted material. The applicable category and capacity requirement should therefore be confirmed with KCC before reliance is placed on a numerical surplus.

The illustrative provision of 131 spaces is substantial and provides a useful capacity test, but the final parking layout must respond to the KCC category agreed for the site. Reserved matters should demonstrate the required allocation and visitor provision, independently usable visitor bays, accessible spaces, EV charging and secure cycle storage. Applying the current

one-space-per-bedroom cycle standard to the indicative mix would require capacity for 180 secure cycle spaces, with the final number adjusted if the reserved-matters bedroom mix changes.

13.5 Refuse, servicing and emergency vehicles

The Transport Statement includes tracking for an 11.4m refuse vehicle. Final internal turning heads and service access are reserved matters, but the illustrative layout demonstrates space for turning and the current evidence directly responds to GBC Waste Services' earlier concern about excessive reversing. Any dead-end route longer than 20m must include suitable fire-service turning facilities in accordance with the Kent Fire & Rescue pre-application advice and Building Regulations Part B.

14 Walking, Cycling, Public Transport and Public Rights of Way

14.1 Walking and cycling network

The Walking & Cycling Audit was undertaken on 27 July 2026 and assessed safety, directness, comfort, accessibility and attractiveness. It records local footways with widths generally between approximately 1m and 2.5m and generally trip-free surfacing. KCC's pre-application concerns regarding the narrow and unlit rural roads, missing footway sections and public-transport limitations remain relevant and are addressed through the proposed improvements and the applicant's rural-context accessibility case.

The application includes a proposed 2.5m country footpath to provide an alternative accessible connection toward local facilities, avoiding a constrained section of the existing Wrotham Road footway where a mature tree restricts wheelchair/pushchair movement. The audit also recommends a crossing point near Newlands Lane and a tactile crossing at White Post Lane.

14.2 Public transport and local facilities

- Bus stops are identified on Wrotham Road approximately 75m and 120m from the site.
- The Walking & Cycling Audit identifies routes 306, 308, 416 and 695 as providing connections including Gravesend, Bluewater, Vigo, Sevenoaks, Cobham and Rochester. Operating days and frequencies vary and should be stated accurately in the final travel information.
- Meopham Railway Station is approximately 6.0km from the site. The audit records 306/308 connections to the station, subject to confirmation of the current timetable and operating frequency.
- Culverstone Green Primary School and the Post Office are each approximately 0.5 miles from the site, with the audit estimating about 10-12 minutes on foot and 3 minutes by cycle.
- Meopham Medical Centre and secondary-school facilities are within reasonable cycling distance.

The audit concludes, as the applicant's evidence, that the site is in a sustainable location within reasonable reach of public transport and local facilities. The rural context means some trips will remain car-based, but national policy does not require rural sites to eliminate car use; it requires sustainable opportunities to be maximised and safe and suitable access to be achievable. The weight given to that conclusion will depend on KCC's assessment and on demonstrating delivery and land control for the proposed off-site measures.

14.3 Public Right of Way NS273

The current Transport Statement maps Public Footpath NS273 outside the site red-line boundary. Given the pre-application comments concerning its proximity and potential relationship with the development, the definitive alignment, legal width and any construction or access interface should be confirmed on the application plans and with KCC Public Rights of Way. The available evidence nevertheless indicates that the route can be preserved.

The application commits to maintaining the legal width and availability of the route. Construction controls can prevent obstruction and ensure any temporary interface is agreed with KCC. Subject to the definitive-plan confirmation and those controls, no unacceptable effect on the Public Right of Way is anticipated.

15 Flood Risk, Drainage, Groundwater and Water Quality

15.1 Flood risk

The entire site lies within Flood Zone 1, the zone of lowest fluvial/tidal probability. The FRA also reports no mapped material risk from fluvial flooding, coastal flooding, surface water, reservoirs or recorded groundwater flooding in the immediate area. The proposed residential use is classified as more vulnerable but is appropriate in Flood Zone 1.

The FRA recommends finished floor levels a minimum of 150mm above adjacent external ground levels and consideration of non-return valves to foul drainage. It concludes that no adverse residual flood impacts to neighbouring property are foreseen, subject to implementation of the strategy.

15.2 Surface-water drainage and SuDS

The drainage objective is to retain/reduce surface-water discharge to greenfield runoff rates for storms up to and including the 1 in 100 year event plus 45% climate-change allowance and to improve runoff quality through infiltration/open SuDS wherever practicable.

The proposed concept conveys runoff through swales and attenuation basins before infiltration where ground and groundwater conditions permit. BRE365/borehole testing, seasonal groundwater information and the Phase 1 land-quality assessment will establish viability and inform the final hierarchy. Shallow and open SuDS should be prioritised. Any deep-bore infiltration would be an exceptional solution requiring specific technical justification, full pollution-risk assessment and agreement in principle from the relevant risk-management authorities. Subject to that evidence, the site has a clear route to an acceptable drainage solution.

15.3 Foul drainage

An existing public foul sewer is identified on the opposite side of Wrotham Road. The proposed scheme uses a foul pumping station and rising main to connect to the public network, subject to the sewerage undertaker's approval. The Revision A drainage drawing notes that the pumping station has been relocated to avoid removal of tree T49, demonstrating cross-discipline coordination.

15.4 Groundwater Source Protection Zone 3

The site lies within Groundwater Source Protection Zone 3. The final drainage design must provide an appropriate treatment train for all runoff sources, including roofs, roads and parking areas, and be informed by the Phase 1 land-quality assessment and groundwater evidence. Catchpits, silt controls and open SuDS can form part of that approach. Agreement with the LLFA and, where appropriate, the Environment Agency will be required before infiltration is relied upon as safe and sustainable.

16 Ecology and Protected Species

16.1 Designated sites and habitats

The PEA identifies Halling to Trottscliffe Escarpment SSSI approximately 850m south of the site and the North Kent Woods and Downs National Nature Reserve approximately 680m south. It confirms that the proposal does not fall within the development categories listed for the SSSI Impact Risk Zone and identifies no non-statutory designated nature conservation site within the zone of influence. Given the separation, site size and nature of the proposal, the PEA concludes that effects on designated sites are unlikely and that they do not represent an ecological constraint.

The nearest ancient woodland is approximately 90m south-west, while the nearest priority deciduous woodland is approximately 65m south-east and outside the application boundary. No direct habitat loss or fragmentation is anticipated. Construction environmental management, pollution-prevention, runoff control and sensitive lighting provide a straightforward and effective means of safeguarding these off-site habitats.

On-site hedgerows H43, H71 and H78 qualify as habitats of principal importance and are considered likely to meet the Hedgerow Regulations definition of important hedgerows. The landscape framework retains and reinforces much of the established network and adds approximately 0.2km of species-rich native hedgerow. The coordinated EcIA/ecology addendum will reconcile the PEA's retention assumptions with the arboricultural removal plan. Where removal is proposed, the recommended importance assessment and any statutory notification will be completed, while retained sections will be protected by appropriate buffers, exclusion fencing and pollution controls.

16.2 Bats

The PEA identified high roost potential in buildings B1/B1a and low potential in B2 and recommended emergence surveys. The subsequent Bat Survey Report records no bats emerging from or re-entering the surveyed buildings and concludes that roosting bats are highly likely to be absent, so no bat roost licence or specific summer-roost compensation is required for demolition on the evidence available. The PEA's precautionary hibernation safeguard can be secured by programming demolition of B1/B1a outside November to March inclusive and incorporating at least one combined summer/winter bat box. Trees T49 (PRF-M) and T9 and T32 (PRF-I) are retained, making further tree-roost survey disproportionate on the current scheme. If a bat is unexpectedly encountered, works will stop and ecological advice will be obtained.

The site remains of moderate suitability for bat foraging/commuting. Five species/species groups were recorded during activity surveys, including common pipistrelle, soprano pipistrelle, noctule, brown long-eared and Nathusius' pipistrelle. Retained hedgerows, trees and scrub should therefore be protected by a sensitive lighting strategy maintaining dark corridors, minimum necessary lighting levels, warm-spectrum LED lighting and controls to avoid spill onto boundary habitat.

16.3 Dormice

The PEA assesses boundary scrub/hedgerows as good-quality dormouse habitat but notes that the vast majority is intended to be retained. It recommends retention/enhancement, a 3m no-construction buffer to retained suitable habitat and sensitive lighting. Where only the limited low-growing scrub/isolated hedge removal described in the PEA occurs, a precautionary non-licensed method statement is proposed; if the habitat-loss assumptions change, further dormouse survey may become necessary.

16.4 Great crested newts and reptiles

The PEA identifies terrestrial habitat potentially suitable for great crested newts but no suitable breeding waterbody within the relevant survey radius, and concludes that an offence is highly unlikely provided a precautionary non-licensed method statement is followed during clearance. The subsequent reptile survey comprised the recommended presence/likely absence work and recorded no reptiles, concluding that reptiles are highly likely to be absent and that reptile-specific mitigation/compensation is not required.

16.5 Other protected and notable species

- Badger: the site provides good foraging/commuting habitat; undertake a pre-works check for new setts, avoid leaving open excavations overnight where practicable or provide escape measures, and store chemicals securely.
- Nesting birds: undertake vegetation/building clearance outside the main March-September nesting season where possible, or arrange an ecologist check immediately before clearance.
- Japanese knotweed: a stand was recorded near tree T27 on the southern boundary. A specialist contractor and detailed invasive-species method statement are required to prevent spread and manage/remove the plant lawfully.
- Barn owl and riparian mammals: no barn owl or evidence of occupation was found and the buildings provide limited nesting features, while the retained green infrastructure maintains good foraging opportunities. The absence of aquatic habitat gives the site negligible potential for water vole, otter or beaver; none represents a constraint to the proposal.
- European hedgehog: watch for animals during clearance of dense scrub or brash, retain or create scrub, tussocky grassland, deadwood and brash habitat, and provide approximately 13cm by 13cm ground-level openings in suitable new boundaries to maintain connectivity.
- Other fauna and invertebrates: undertake a pre-start walkover and sensitively soft-dig any mammal holes under ecological supervision. If orchard/fruit trees or deadwood are removed, use an ecologist-led hand search for notable invertebrates, retain and translocate suitable cherry wood, and include appropriate larval food plants in the landscape scheme.

16.6 Ecological enhancements

The PEA recommends integrated bat bricks/tubes and bat boxes, including a combined summer/winter box, bird boxes targeted to species such as house sparrow and starling, native species-rich hedgerow, species-rich meadow grassland, deadwood habitat piles and wildlife-focused pond design. Hedgehog-permeable boundaries and Bee Bricks paired with at least 1m² of pollinator planting per brick add further species-specific benefits. These measures can be incorporated into reserved matters and the landscape/ecological management regime alongside the statutory BNG measures.

16.7 Ecological Impact Assessment coordination

The evidence set comprises the PEA, bat and reptile surveys, arboricultural assessment, statutory BNG assessment and detailed landscape proposals. A coordinated Ecological Impact Assessment/ecology addendum will consolidate those sources, reconcile the hedgerow-retention and removal assumptions and confirm the combined mitigation, enhancement and monitoring schedule. The surveys identify no ecological matter that appears incapable of satisfactory mitigation or statutory BNG delivery.

17 Biodiversity Net Gain

17.1 Statutory requirement

The development is subject to the statutory biodiversity gain condition and must deliver at least 10% BNG in accordance with Schedule 7A of the Town and Country Planning Act 1990 and the statutory metric rules. Habitat, hedgerow and watercourse unit types are separate and cannot be freely combined or converted.

17.2 Baseline and post-development results

BNG component	On-site position	Delivery mechanism	Overall outcome
Area-based habitat	Baseline 25.37 units; 17.80 post-development units retained, created or enhanced on site	10.10 units (20.20 Tier A1 credit equivalent) to be purchased and allocated from a registered gain site	Defined statutory route, subject to securing and recording the required off-site allocation
Hedgerow	Baseline 3.92 units; 5.05 post-development units	Approximately 0.2km new species-rich native hedgerow	28.65% on-site gain
Watercourse	No watercourse units affected	No additional mechanism required	No adverse effect

The Version 2 assessment records a pre-development baseline of 25.37 area-habitat units and 3.92 hedgerow units. The controlling statutory metric records post-development on-site provision of 17.80 area-habitat units and 5.05 hedgerow units. Using the metric's unrounded figures, the resulting on-site area-habitat change is -7.56 units (-29.82%), while hedgerows increase by 1.12 units (+28.65%). No irreplaceable habitat or watercourse unit is affected. The calculation fixes the remaining requirement at 10.10 off-site habitat units, equivalent to 20.20 Tier A1 credits, providing the basis for the statutory delivery mechanism.

The on-site hedgerow component delivers a 28.65% gain. The 10.10-unit area-habitat balance is proposed to be purchased from a land manager or habitat-bank provider and allocated to the development from a registered biodiversity gain site before approval of the Biodiversity Gain Plan. The strategy therefore provides a clear statutory route to the 10% target, subject to the provider, units and allocation being secured and recorded.

17.3 On-site habitat retention, creation and enhancement

The controlling statutory metric records a total of 17.80 post-development on-site area-habitat units. This total comprises retained, created and enhanced habitats as set out in the metric workbook, including other neutral grassland, mixed scrub, modified grassland, vegetated gardens, SuDS and tree planting. The metric workbook total governs the planning assessment and avoids reliance on narrative sub-totals that do not reconcile with it.

The landscape strategy proposes 230 new trees. The BNG assessment records that 82 are within private gardens and, in line with the metric approach used by the ecologist, do not contribute to the post-development unit score. The remaining 148 trees outside private gardens contribute to the metric. The 82 garden trees remain valuable as landscape/amenity/ecological features even though they are excluded from the quantitative BNG calculation.

The metric also includes 0.2km of new species-rich native hedgerow, which contributes 1.34 created hedgerow units and underpins the overall 28.65% hedgerow gain.

17.4 Off-site BNG delivery

The scheme maximises viable habitat retention, creation and enhancement on site while using the established statutory off-site mechanism for the 10.10-unit balance. A land manager or habitat-bank provider is to register the gain site; the required units must be purchased and their allocation to this development recorded on the national biodiversity gain sites register before the Biodiversity Gain Plan is approved. The habitat works and management will be legally secured for at least 30 years through a Section 106 agreement or conservation covenant as appropriate. This sequence provides a defined route to delivery and can follow the local hierarchy identified by emerging Policy LP8, but completion remains subject to securing the provider and allocation.

Government statutory credits are a final fallback only if the target cannot be achieved through on-site and registered off-site delivery. The application does not rely on credits as its primary BNG strategy.

17.5 Local Nature Recovery Strategy

The Local Nature Recovery Strategy maps the site for potential GL4.2 acid grassland and heathland creation. The ecologist considers that habitat type unsuited to the layout and spatial requirements of this proposal and has consequently applied low strategic significance, a conservative metric approach. The proposed combination of neutral grassland, mixed scrub, native hedgerow, tree planting and SuDS, subject to the off-site allocation being secured, will strengthen ecological connectivity and make a meaningful contribution to local nature recovery.

18 Heritage and Archaeology

18.1 Built heritage

AB Heritage concludes that Woodlands Farm, dating from approximately 1902 and subsequently altered/extended, is not of discernible heritage significance and has no relevant group/evidential value that would make it a heritage asset. The assessment also concludes that nearby designated and non-designated built heritage assets do not share a visual/contextual relationship with the site that would result in heritage harm. No further built-heritage work is recommended.

This provides a reasoned response to the pre-application suggestion that retaining the existing house should be considered because of its visual contribution. Retention was advice rather than a policy requirement, and the specialist heritage evidence subsequently concludes that demolition would not result in loss of heritage significance. The visual contribution of the existing building and quality of the replacement settlement edge will be tested through the LVIA and reserved-matters design.

18.2 Archaeology

The Archaeology Desk-Based Assessment identifies general potential for buried remains and recommended geophysical survey to provide a stronger evidential basis. That survey has now been completed. The staged approach is proportionate and demonstrates that archaeological interests have been properly considered from the outset.

This recommendation reflected KCC Archaeology's pre-application advice, which requested an Archaeological Desk-Based Assessment together with the results of a geophysical magnetometer survey. The magnetometer survey has now been completed and should be read alongside the DBA as part of the archaeological evidence base for the outline application.

18.3 Magnetometer Survey - Scope and Methodology

Kevin Cornwell undertook the geophysical survey at Woodlands Farm between 10 and 12 June 2026. Approximately 1.8 hectares of all accessible land was surveyed across the cherry orchard, all-weather equestrian arena, recreational land and eastern horse-grazing field. The built-up north-western area containing the farmhouse and ancillary buildings was unsuitable for magnetometry and can be addressed through the normal staged archaeological process if required.

The fieldwork used fluxgate gradiometer magnetometry in accordance with standard geophysical survey procedures. A Bartington Grad 601-2 instrument, survey-grade Leica GPS and closely spaced readings provided a reliable and appropriately detailed evidence base for interpreting the accessible parts of the site.

18.4 Magnetometer Survey - Results and Interpretation

The survey report identifies limited archaeological evidence within the accessible areas surveyed. The western survey areas produced little evidence of archaeological activity, while the strong positive and negative responses recorded there are interpreted as predominantly modern ferrous material associated with the equestrian arena and recreational use. This conclusion is confined to the land covered by magnetometry.

Four regularly spaced magnetic responses beneath the equestrian arena are considered most likely to be modern. Their regular spacing and relationship with the constructed arena support that interpretation. Any residual archaeological interest, including within inaccessible areas, can be addressed through the focused evaluation or other work agreed with KCC Archaeology.

Area 5 contains a former fence line, a shallow linear feature, faint responses interpreted as underlying geological variation and a possible infilled pit. Magnetic disturbance by the northern gateway is associated with modern hardcore. The small number and limited character of the anomalies do not form an obvious concentration indicative of a major site, although their significance and any required investigation remain matters for KCC Archaeology.

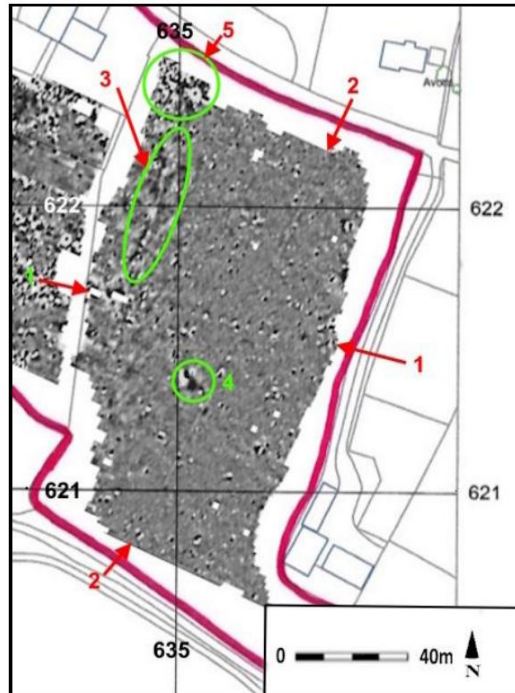
18.5 Archaeological Planning Implications and Mitigation

The completed geophysical survey materially strengthens the archaeological evidence for approximately 1.8 hectares of accessible land. It identifies no concentration of anomalies clearly indicative of a major archaeological site. The features

recorded and the inaccessible areas are capable of targeted evaluation, preservation by record or other proportionate mitigation where required by KCC Archaeology.

The DBA and magnetometer report provide a substantial basis for archaeological consultation. KCC Archaeology can confirm the scope and timing of any focused Written Scheme of Investigation, trial trenching or subsequent mitigation, taking account of both surveyed and inaccessible areas. A proportionate staged approach can protect archaeological interests without undermining the principle of the 67-dwelling development.

Figure 3 - Magnetometer Survey Interpretation: Survey Area 5



Extract from Figure 8 of the Geophysical Survey (Project Code CULWOODFM), showing the processed magnetometer data and interpreted features within the eastern grazing field. Feature 2 corresponds with the shallow linear ditch; Feature 4 is the possible infilled pit; other marked responses are interpreted in the survey report as former fencing, probable geological responses and modern magnetic disturbance.

19 Environmental Protection, Contamination, Noise and Construction

19.1 Land contamination

The site's historic residential, agricultural and equestrian uses do not presently indicate an overriding contamination constraint. A Phase 1 desk study, conceptual site model and preliminary risk assessment will support the application and inform the infiltration strategy. If that work identifies a potential pollutant linkage, targeted investigation, remediation and verification can be secured through proportionate planning controls. This provides a clear route to demonstrating suitable ground conditions.

19.2 Noise and amenity

The low-density framework, substantial buffers and reserved-matters control provide scope to achieve a high-quality acoustic environment alongside Wrotham/Gravesend Road. Proportionate baseline noise screening or assessment will confirm the position and inform siting, glazing, ventilation, gardens and landscape measures. No issue has been identified that appears incapable of satisfactory design mitigation.

19.3 Construction effects

Construction effects can be controlled through a Construction Environmental Management Plan / Construction Logistics Plan covering hours, dust, noise/vibration, wheel washing, parking, deliveries, site security, ecology, tree protection, drainage/pollution prevention and protection of the highway/PROW. This is a conventional and enforceable condition for a major residential development.

19.4 Air quality and emissions

The Transport Statement predicts modest peak traffic generation and the proposal incorporates EV charging and active-travel measures. On the present information, no significant operational air-quality effect is anticipated, but proportionate screening will confirm the position, including effects on nearby public routes. Construction dust can be controlled through the CEMP and any additional measures recommended by GBC Environmental Protection.

19.5 Energy, water and climate resilience

The outline framework provides a strong platform for a fabric-first, low-energy and climate-resilient development. Reserved matters can secure water efficiency, overheating resilience, responsible materials, low-carbon energy, EV/e-bike infrastructure and coordination with the SuDS, landscape and ecological-lighting strategies. These measures reinforce the scheme's environmental credentials.

20 Public Open Space, Healthy Communities, Crime Prevention, Waste and Fire Access

20.1 Public open space and play

The current plan provides meaningful on-site open space and a play area, directly addressing the pre-application criticism that the earlier concept lacked open-space provision. The spaces are integrated with SuDS and the landscape framework and are positioned within a short walk of the proposed homes. A quantified open-space and play schedule, accessibility assessment and comparison with applicable standards will confirm the final provision and support the Golden Rules and healthy-community objectives.

Detailed play specification, accessibility, phasing, ownership and maintenance can be secured by condition and the Section 106 agreement. The pre-application leisure contribution of approximately £125,193 was calculated using an earlier, higher population assumption and should not be carried forward mechanically to the current 67-dwelling proposal. Any off-site leisure contribution must be recalculated using the current scheme and then-current evidence/formula and must satisfy the statutory planning-obligation tests.

20.2 Crime prevention and community safety

Kent Police recommended Crime Prevention Through Environmental Design / Secured by Design principles. At reserved matters these should include natural surveillance of streets, parking and open space; secure cycle/bin storage; defensible boundaries; avoidance of blank walls; well-designed lighting compatible with ecology; and appropriate treatment of community/play spaces to avoid nuisance while remaining overlooked.

20.3 Waste and refuse collection

The revised highway evidence includes 11.4m refuse-vehicle tracking and a turning strategy, demonstrating capacity to accommodate refuse collection. Detailed bin storage, collection points, routing and any necessary tracking refinements can be finalised at reserved matters in accordance with the Council's guidance.

20.4 Fire and rescue access

The illustrative street framework provides space for emergency access and turning. Detailed fire-appliance tracking, hose-lay distances and hydrant provision will be confirmed at reserved matters and through Building Regulations Part B. The framework therefore provides a clear route to a safe and compliant detailed solution.

21 Infrastructure and Planning Obligations

21.1 Principles

Planning obligations should be confined to measures that are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. The applicant is willing to enter into a Section 106 agreement to secure justified obligations, subject to evidence and the statutory tests.

21.2 Likely heads of terms

Potential obligation	Planning purpose / approach
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Affordable housing	50% Golden Rules contribution; detailed tenure, size, local connection/cascade and delivery mechanism to be agreed.
Open space / play	Delivery, phasing and long-term management/maintenance of public open space, play and communal landscape.
Biodiversity Net Gain	Purchase and allocation of 10.10 units from a registered gain site, with 30-year management secured through the statutory BNG mechanism, Section 106 agreement and/or conservation covenant as appropriate.
Highways / active travel	Any specific off-site works or contributions identified by KCC as necessary and proportionate, including approved pedestrian/crossing measures.
Education / youth / social services / libraries / waste	Any KCC contribution that is evidenced at determination and satisfies the statutory tests.
Health	Any evidenced NHS contribution calculated under the then-current methodology and satisfying the tests.
Leisure / sport	To be recalculated for the 67-dwelling development if justified; the earlier pre-application figure is not automatically applicable.
Management company / estate stewardship	Long-term management of communal landscape, SuDS and open space where not adopted by a statutory authority.

22 Planning Conditions and Reserved Matters Controls

A substantial proportion of detailed matters can appropriately be controlled through reserved matters and planning conditions. This is particularly important in an outline application and avoids requiring premature detail while ensuring the final development remains within the environmental parameters established by the technical evidence.

Topic	Suggested control
Reserved matters	Submission/approval of appearance, landscaping, layout and scale within statutory time limits.
Approved access	Detailed construction of the principal Newlands Lane access, visibility splays and any approved highway works before occupation/defined trigger.
Parking / cycle / EV	Detailed parking, visitor spaces, secure cycle storage and EV charging.
Construction traffic	Construction Logistics / Traffic Management Plan.
Surface water	Detailed drainage design, BRE365/infiltration results, exceedance, maintenance and water-quality strategy.
Foul drainage	Final connection/pumping-station details and approval by the sewerage undertaker.
Contamination	Phase 1, any necessary Phase 2/remediation and verification.
Archaeology	Targeted evaluation / trial trenching, Written Scheme of Investigation and mitigation as agreed with KCC Archaeology, taking account of the completed magnetometer survey and the archaeological DBA.
Trees	Final Arboricultural Method Statement, Tree Protection Plan and supervision.
Landscape	Detailed soft/hard landscape, planting specifications, replacement planting, establishment and management.
Ecology	Ecological mitigation/enhancement plan and CEMP; protected hedgerow/woodland safeguards; sensitive lighting; nesting-bird and pre-start fauna checks; bat, dormouse and GCN precautionary measures; hedgehog permeability; and invasive-species control.
BNG	Statutory Biodiversity Gain Plan approval before commencement; recorded allocation of 10.10 off-site units from a registered gain site; and associated 30-year legal securing mechanism.
Open space / play	Detailed layout, equipment, phasing, accessibility and maintenance.
Fire / refuse	Detailed emergency/refuse tracking, turning and bin storage.
Noise / construction	Construction hours, CEMP and any acoustic measures found necessary at detailed stage.

23 Planning Balance and Compelling Case for Approval

23.1 Primary case: paragraph 155 supports approval

The evidence demonstrates that all four paragraph 155 criteria are satisfied:

1. The site has the grey-belt characteristics identified by the pre-application officer response and, on the applicant's assessment of this contained 3.4ha edge parcel and the wider plan-area context, development would not fundamentally undermine the purposes of the remaining Green Belt.
2. There is demonstrable unmet housing need: 2.53 years of supply, a 2,003-home five-year shortfall and a 59% Housing Delivery Test result.
3. The applicant's evidence supports a sustainable rural-edge location through the Transport Statement, Walking & Cycling Audit, nearby bus services, local facilities and proposed active-travel improvements, subject to KCC assessment and securing deliverable measures.
4. The development commits to the Golden Rules: a 50% affordable-housing contribution, necessary infrastructure and accessible public green space, with landscape/nature-recovery measures to be secured through the Section 106 agreement, conditions and statutory BNG process.

The proposal is therefore not inappropriate development in the Green Belt on the applicant's assessment. NPPF paragraph 158 requires significant weight in favour of development that complies with the Golden Rules, while paragraph 11(d) is engaged by the severe housing land-supply shortfall. The limited and localised effects of development are addressed by the landscape framework, technical evidence and defined routes for confirmatory assessment, reserved matters, conditions and planning obligations.

23.2 Benefits

- 67 additional homes in a borough with a 2,003-home five-year supply shortfall.
- A 50% affordable housing contribution under the Golden Rules, representing a major social benefit.
- A mixed two-, three- and four-bedroom housing offer, increasing housing choice while the final mix is agreed with GBC.
- On-site public open space and a play area, absent from the earlier pre-application concept, supporting health, informal recreation and social interaction.
- 230 new trees, species-rich hedgerow and mixed native scrub, strengthening long-term landscape structure.
- A 28.65% on-site hedgerow-unit gain and a defined legal route to secure the remaining habitat BNG off-site for 30 years.
- SuDS, attenuation and landscape-integrated drainage designed to control runoff and respond to climate change.
- Pedestrian/active-travel improvements including a proposed 2.5m country footpath and crossing enhancements.
- Construction expenditure and employment, together with increased household spending capable of supporting nearby services and facilities.

23.3 Limited effects and comprehensive mitigation

Planning consideration	Positive response
Landscape and Green Belt change	Limited to a contained settlement-edge parcel. The reduced 67-home quantum, meaningful open space, retained vegetation and 230-tree strategy provide a strong mitigation framework and attractive new green edge, to be tested through the LVIA.
Biodiversity Net Gain	A 28.65% on-site hedgerow gain and a defined route to purchase and allocate 10.10 off-site habitat units from a registered gain site provide the mechanism for achieving the statutory 10% gain, subject to securing and recording that allocation.
Trees and hedgerows	AIA assesses a minor amenity effect; extensive replacement planting improves long-term diversity and canopy cover.
Traffic and movement	Modest peak flows, measured visibility, collision review and tracking support the Transport Statement's safe-and-suitable-access conclusion, subject to KCC assessment, Road Safety Audit and detailed approval.
Archaeology	DBA and magnetometer survey identify only limited anomalies, readily addressed through proportionate staged control.
Agricultural land	A contained equestrian/grazing parcel; the land grade will be confirmed and any effect weighed against acute housing need and public benefits.
Construction	Temporary effects are conventionally and effectively controlled by CEMP and traffic-management conditions.
Residential amenity	Low-density capacity framework and reserved-matters control provide ample scope for excellent privacy and amenity.

23.4 Alternative Very Special Circumstances case

If, contrary to the primary case, the Local Planning Authority concludes that paragraph 155 is not fully satisfied and the development is inappropriate, Very Special Circumstances are advanced in the alternative. In that exercise, substantial weight must be given to any harm to the Green Belt, together with any other identified harm. Against that harm must be weighed the acute housing need, delivery of 67 homes, the 50% affordable-housing contribution, Golden Rules green space and infrastructure, the reduced landscape-led scheme, sustainable-location evidence, landscape/ecological enhancements, SuDS and economic benefits.

Those considerations are unusually strong because national policy provides that qualifying grey-belt housing meeting paragraph 155 should not be regarded as inappropriate, and because the pre-application officer response concluded that the site can be described as grey belt and acknowledged the housing need. Even if the decision-maker reaches a different conclusion on paragraph 155(a) or (c), those factors remain material and carry substantial cumulative weight in the alternative balance.

Even after giving substantial weight to any Green Belt harm and taking account of any other harm established through the completed evidence, the acute housing need, delivery of 67 homes, 50% affordable-housing contribution, the site's grey-belt characteristics, accessibility case, public green space, SuDS, landscape enhancement, biodiversity route and economic benefits clearly outweigh the identified effects. Matters appropriate for reserved matters, conditions, legal agreement or statutory BNG approval can then be secured through those mechanisms, while evidence necessary to determine the principle and access will be provided for determination.

24 Conclusion

The proposal is a materially improved, policy-responsive outcome of the pre-application process. The 67-home framework is structured around public open space, play provision, multiple SuDS features, retained trees and hedges, substantial new planting, an illustrative 131-space parking provision and a clear street hierarchy. Detailed parking remains subject to agreement of the applicable KCC category and reserved-matters approval.

The current national policy context strongly supports approval. Gravesham can demonstrate only 2.53 years of housing supply, with a 2,003-home shortfall and a Housing Delivery Test result of 59%. The development would make a meaningful and immediate contribution to meeting that acute need.

The pre-application officer response concluded that the site can be described as grey belt. The applicant's assessment, having acknowledged the Council's Stage 2 evidence, concludes that this contained settlement-edge parcel does not contribute strongly to sprawl, town merger or the setting of an historic town and that development would not fundamentally undermine the purposes of the remaining Green Belt across the plan area. On that evidence, paragraph 155(a) is satisfied.

The Transport Statement supports safe and suitable access and modest traffic generation, subject to KCC's assessment and the necessary highway approvals. The wider evidence supports a sustainable rural-edge case, confirms Flood Zone 1 status, identifies a clear route to an acceptable drainage solution, records minor arboricultural effects and no identified built-heritage harm, and establishes proportionate archaeological and protected-species safeguards. The combined on-site/off-site BNG strategy provides a clear route to the statutory 10% gain subject to securing the off-site allocation and Biodiversity Gain Plan approval.

The benefits are substantial and mutually reinforcing: 67 homes, a 50% affordable-housing contribution, public open space, play, active-travel improvements, 230 new trees, species-rich hedgerow, SuDS, biodiversity delivery, construction employment and increased local spending. Subject to the confirmatory assessments and approvals identified in this Statement, the effects are localised and capable of avoidance or mitigation and are outweighed by those economic, social and environmental benefits.

For these reasons, the proposal constitutes sustainable development and benefits from strong support under NPPF paragraphs 11(d), 155 and 158. The Local Planning Authority is respectfully invited to grant outline planning permission, subject to appropriate conditions and completion of a Section 106 agreement securing the 50% affordable-housing contribution and other necessary obligations.

Planning recommendation- The proposal satisfies the applicant's assessment of the current national policy route for grey-belt housing, makes a meaningful contribution to an acute housing shortfall and commits to a 50% affordable-housing contribution. The landscape-led framework and technical evidence provide a strong basis for approval, with the access subject to KCC assessment and the outstanding confirmatory matters identified in this Statement. Outline planning permission should be granted subject to appropriate conditions and a Section 106 agreement.

Appendix A - Pre-Application Response Matrix

Pre-application matter	Current scheme response	Positive planning position
Housing capacity and character	Reduced to 67 homes with a context-responsive gross density, larger green areas and a strong landscape framework.	Fully addressed by the revised framework.
Public open space and play	Meaningful, well-distributed on-site open space, a play area, SuDS and connected green links are integral to the plan; the final quantum will be confirmed against applicable standards.	Strong positive benefit; detailed delivery secured at RM/S106.
Parking and street design	The illustrative plan shows 131 spaces, including 18 visitor spaces. The applicable KCC locational category and final parking/cycle requirement remain to be agreed.	Substantial illustrative provision; final compliance subject to KCC category agreement and reserved-matters design.
Highway access	Revised Newlands Lane access assessed using measured speeds, visibility, collision review and tracking in response to KCC's pre-application comments.	Supported by the applicant's Transport Statement; subject to KCC assessment, Road Safety Audit and detailed highway approval.
Sustainable movement	Walking & Cycling Audit; buses 75m/120m; local services; 2.5m country footpath and crossing suggestions.	Positive rural-context case, subject to KCC assessment and securing deliverable off-site measures.
Refuse servicing	11.4m refuse vehicle tracking and more developed turning strategy.	Capacity is demonstrated; detailed routing and collection arrangements remain subject to reserved matters.
Emergency access	Dead-end turning requirement identified.	Suitable turning and access can be secured at reserved matters and Building Regulations stage.
Landscape-led approach	Revised landscape plan with 230 trees, extensive open space, retained boundaries, native hedgerow and scrub.	Strong landscape framework, with the formal effects and mitigation to be confirmed through the LVIA.
Existing farmhouse	Current scheme retains demolition; specialist heritage report finds no heritage significance.	Specialist evidence confirms no heritage reason to require retention.
Ecology and protected species	PEA, bat and reptile surveys, AIA, BNG assessment and landscape strategy identify no apparently overriding ecological constraint; a coordinated EclA/addendum will reconcile hedgerow assumptions and consolidate safeguards.	No apparently overriding ecological constraint; final coordination and mitigation to be confirmed through the EclA/addendum.
Biodiversity Net Gain	A 28.65% on-site hedgerow gain with a quantified 10.10-unit off-site purchase and registered-allocation route to complete the statutory target.	Clear statutory route, subject to securing the provider, units and registered allocation.
Flood risk and SuDS	FRA and Drainage Strategy; FZ1; swales/basins/infiltration; +45% climate allowance.	Flood Zone 1 and a clear drainage route, subject to testing, land-quality/groundwater evidence, water-quality assessment and authority agreement.

Public Right of Way NS273	The current TS maps NS273 outside the red line; the definitive alignment and any interface should be confirmed with KCC PROW.	No unacceptable effect anticipated subject to definitive-plan confirmation and construction controls.
Archaeology	DBA and magnetometer survey completed; limited anomalies identified within approximately 1.8ha of accessible land, with further scope for KCC to confirm.	Appropriately addressed through proportionate staged control.
Land condition	Historic uses do not presently indicate an overriding constraint; Phase 1 desk study/CSM will confirm and inform drainage.	Phase 1 evidence and, if indicated, investigation/remediation provide a clear delivery route.
Agricultural land	Contained equestrian/grazing parcel; site-specific ALC assessment will confirm the precise grade and extent.	Housing and affordable-housing benefits attract substantial positive weight against any confirmed effect.
Affordable housing and Golden Rules	Commitment to 50% affordable housing contribution.	50% contribution is a major social benefit and attracts significant positive weight.
Infrastructure	Necessary and proportionate KCC/GBC/NHS measures can be secured through the Section 106 agreement.	Capable of being secured where evidenced and compliant with the statutory tests.
Housing mix and accessibility	Strong family-housing mix with flexibility for accessible homes and refinement at RM/S106 stage.	Positive housing choice while retaining the fixed 67-dwelling total.
Emerging Local Plan	Relevant objectives are addressed alongside the operative NPPF grey-belt route and acute housing need.	National policy and current evidence provide strong support for this windfall scheme.

Appendix B - Policy Compliance Matrix

Policy / test	Assessment	Conclusion
NPPF 11(d)	2.53-year supply and HDT 59% engage tilted balance.	Complies / significant positive weight.
NPPF 143 / Annex 2 grey belt	Pre-application officer response concluded that the site can be described as grey belt; no strong contribution to purposes (a), (b) or (d) was identified.	Satisfied.
NPPF 155(a)	Contained edge parcel; limited local change does not fundamentally undermine the plan-area Green Belt.	Satisfied.
NPPF 155(b)	2.53-year supply / 2,003-home deficit / HDT 59%.	Satisfied.
NPPF 155(c)	Woodlands Farm's Transport Statement and Walking & Cycling Audit prioritise sustainable opportunities, assess safe/suitable access and network effects, and identify active-travel measures in the vision-led terms of NPPF paragraphs 110 and 115.	Applicant concludes satisfied; identified measures remain subject to KCC assessment, land control and the necessary conditions, obligations and highway agreements.
NPPF 156-159	50% AH commitment, infrastructure, public green space, landscape/nature recovery.	Applicant concludes satisfied; Golden Rules are committed and are to be secured through the Section 106 agreement, conditions and statutory BNG process.

CS02	Current national grey-belt policy and acute housing need are later and weighty material considerations.	Overall compliance when current national policy and housing need are properly applied.
CS11	Transport evidence supports the access and sustainable-travel case; parking/cycle details and locational category remain to be agreed.	Complies in principle, subject to the identified authority approvals and detailed controls.
CS12	Retained habitats, landscape structure, ecological mitigation and BNG route.	Complies in principle; mitigation will be consolidated through the EclA/addendum and the statutory BNG route remains subject to securing the off-site allocation.
CS13 / LT6	On-site open space and play; off-site leisure only if justified.	Complies in principle; meaningful on-site open space and play are integral to the scheme, with the final schedule to confirm standards compliance.
CS14 / CS15	Mixed housing sizes and low-moderate gross density responsive to context.	Complies; context-responsive density and flexible housing mix.
CS16	50% Golden Rules contribution exceeds 35% rural baseline.	Complies; 50% contribution exceeds the adopted rural baseline.
CS18	FZ1; SuDS; greenfield-rate objective; +45% climate allowance.	Complies in principle; Flood Zone 1 and a clear SuDS route subject to testing, environmental evidence and authority agreement.
CS19	Landscape-led design, amenity safeguards, substantial illustrative parking and defined environmental controls/confirmatory assessments.	Complies in principle; detailed matters are secured through reserved matters and conditions, with principle-critical evidence provided for determination.
CS20 / TC7	No built-heritage harm; DBA and magnetometer survey identify only limited archaeological features.	Complies; archaeology is capable of proportionate staged mitigation.
KCC Vehicle Parking Standards 2024	The Transport Statement tests a suburban benchmark of 122 spaces and the plan shows 131, including 18 visitor spaces; the applicable KCC category remains to be agreed.	Substantial illustrative provision; final compliance subject to confirmation of the applicable KCC category and detailed layout.
Mandatory BNG	A 28.65% hedgerow gain on site with a quantified 10.10-unit off-site purchase and registered-allocation route intended to complete the target.	Defined statutory route; delivery subject to securing and recording the off-site allocation and Biodiversity Gain Plan approval.
Emerging LP1 / LP7	National policy expressly supports qualifying grey-belt windfall development; the emerging plan is unadopted and unexamined.	Strongly supported by the operative NPPF and current housing evidence.
Emerging LP8	Landscape-led design, ecology/AIA evidence, native planting and a locally focused BNG route.	Complies in principle and supports nature recovery.
Emerging LP12	50% affordable housing aligns with the emerging policy direction; detailed mix and accessibility are deliverable at RM/S106.	Complies in principle; details remain appropriately reserved or legally secured.

Appendix C - Suggested Conditions and Obligations

The following schedule identifies matters suitable for conventional, enforceable planning controls. It is offered to assist constructive discussion with the Local Planning Authority and should be read alongside the commitment to provide principle-critical confirmatory evidence for determination.

C.1 Indicative planning conditions

1. Reserved matters and time limits.
2. Approved principal access, visibility splays and implementation trigger.
3. Construction Traffic / Logistics Management Plan.
4. Detailed parking, visitor parking, EV charging and cycle storage.
5. Detailed surface-water scheme supported by BRE365/infiltration testing, exceedance, water-quality and maintenance information.
6. Foul drainage connection and pumping-station details.
7. Contamination investigation/remediation/verification as necessary.
8. Targeted archaeological evaluation/trial trenching, Written Scheme of Investigation and mitigation as agreed with KCC Archaeology, taking account of the completed magnetometer survey.
9. Detailed Arboricultural Method Statement, Tree Protection Plan and monitoring.
10. Detailed landscaping, establishment and replacement planting.
11. Landscape/ecological management plan covering communal areas, SuDS, native habitat creation and the specified bat, bird, hedgehog, invertebrate and pollinator enhancements.
12. Sensitive external lighting strategy protecting dark ecological corridors.
13. Ecological construction controls including protected hedgerow/woodland buffers, bat demolition timing and summer/winter box provision, dormouse/GCN precautionary methods, nesting-bird and pre-start fauna checks, hedgehog permeability and conditional invertebrate safeguards.
14. Japanese knotweed / invasive species management method statement.
15. Open-space/play delivery and maintenance.
16. Refuse storage/collection and detailed vehicle tracking.
17. Fire appliance access/turning.
18. Construction Environmental Management Plan including dust/noise/pollution/PROW/tree/ecology controls.
19. Any acoustic mitigation shown necessary by detailed assessment.
20. Statutory Biodiversity Gain Plan approval prior to commencement, supported by the recorded allocation of 10.10 off-site units and the associated 30-year legal mechanism.

C.2 Indicative Section 106 heads

- 50% affordable housing contribution with agreed tenure/size/local-connection/cascade provisions.
- Public open-space, play, landscape and SuDS stewardship/management arrangements.
- Necessary and proportionate KCC/GBC/NHS infrastructure contributions based on current 67-dwelling impact and statutory tests.
- Any required active-travel/highway obligations not delivered through planning conditions/highway agreement.
- Purchase and recorded allocation of 10.10 off-site habitat units from a registered gain site, coordinated with the statutory biodiversity gain sites register and a 30-year management obligation.

Appendix D - Policy and Evidence Source Register

D.1 Verified policy and evidence sources

Official policy / evidence source	Date / status	Role in the planning case
National Planning Policy Framework	December 2024; amended 7 February 2025	Operative national policy
Gravesham Core Strategy and Policies Map	Adopted September 2014	Adopted borough development plan
Saved Gravesham Local Plan First Review policies	1994 (saved)	Adopted policies where still extant
Kent Minerals and Waste Local Plan 2024-2039	Adopted 13 March 2025	Adopted county development plan
Gravesham Local Plan 2042	Regulation 19, 17 April 2026	Emerging and unexamined; relevant objectives addressed by the scheme.
Gravesham Five-Year Land Supply Statement 2025-2030	July 2026	2.53-year supply evidence
Gravesham Local Housing Needs Assessment	2025	Mix and housing-needs evidence
KCC Vehicle Parking Standards 2024	Effective 6 February 2025	Current county parking guidance
Design for Gravesham Design Code	Adopted 28 May 2024	Local design guidance